

An AI(artificial intelligence) \* analysis of the transcript created at the session:  
Matter 5 (West Hall Farm, Cleadon G4) and Issue 6 (Whitburn Lodge Shearwater G5 & G6)  
Hearing sessions: Thursday 17 July 2025

## 1. Meeting details and attendees

- Purpose: Hearing sessions into the examination of the South Tyneside Local Plan, focusing on:
  - Matter 5 / Issue 5: Land at West Hall Farm, Cleadon (Site G4).
  - Issue 6: Whitburn Lodge and Shearwater sites, Whitburn (Sites G5 and G6).
- Inspector (Chair): David Spencer, independent examining inspector appointed by the Secretary of State.
- Council team (South Tyneside Council):
  - Paul Sherevian KC (acting for the Council)
  - Deborah Lamb – Operations Manager, Spatial Planning
  - Rachel Cooper – Senior Planning Policy Officer
  - Matt Clifford – Senior Planning Policy Officer
  - Trevor Mill – Strategic Transport Lead
  - Lucy Routledge – Historic Environment Officer
- Site promoter / landowner representatives:
  - Mr Dickinson (Deo, representing the Church Commissioners – landowner for G4 and Whitburn sites)
- Local participants and interested parties (selection):
  - Timothy Duffy – interested party in site G4
  - Ian Bey – resident of Cleadon
  - Min Butler – Secretary, Cleadon & East Boldon Labour Party (and speaking for local objectors)
  - Representatives of East Boldon / Whitburn Neighbourhood Forum, including Mr Lavell (for Whitburn).
- Practical arrangements: Sessions recorded and live streamed by the Council; only table participants may speak.

## 2. Summary of key discussion themes

### 2.1 Document management and accessibility

#### Key points

- Mr Duffy and Mr Bey raised serious concerns about the volume, indexing and accessibility of examination documents on the Council’s website, stating that incomplete indexing may prejudice public participation and the examination outcome.
- Mr Duffy reported his own audit:
  - Current index: 169 entries, 275 documents, 19,811 pages.
  - Actual website total: 491 documents, 23,996 pages.
  - Regulation 19 stage: 148 documents, 9,638 pages.
- Residents, particularly retired and working people, found it “virtually impossible” to keep track of changes and updates over 9–10 years.

#### Council / Inspector response

- The Inspector acknowledged the point, confirmed it had been raised earlier, and undertook to reflect on it and speak with the Programme Officer if needed, but noted that the scale of documentation is not unusual for plan examinations.
- The Council highlighted the “Examination News” update page, and the Inspector confirmed he needed to move on to the substantive Cleadon and Whitburn matters.

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## 2.2 Green Belt: West Hall Farm, Cleadon (G4 – parcel CL1)

Council position / evidence

- Site G4 sits within Green Belt parcel CL1 in the South Tyneside Green Belt Review.
- The study finds:
  - Moderate harm against Green Belt purposes 1 (checking sprawl), 2 (preventing merging of towns) and 3 (safeguarding countryside from encroachment).
  - Low harm against purpose 4 (setting of historic towns).
- The study and site framework emphasise:
  - Moore Lane (south) and Sunderland Road (west) provide “relatively strong, regular, alternative Green Belt boundaries.”
  - Policy SP7 and the site framework require a defensible boundary and landscaping, including set-back built development along the A1018 to retain openness, and compensatory Green Belt improvements (to be refined).

Objectors' position

- Mr Butler (Cleadon) and Mr Duffy, supported by Mr Bey, argue that moderate harm significantly underestimates the Green Belt impact.
- Main points:
  - G4 materially contributes to:
    - Checking urban sprawl between South Tyneside and Sunderland.
    - Maintaining separation and preventing the gap between the towns being reduced by c. 600–700 yards.
    - Maintaining openness and countryside character (views to Cleadon Hills, Penshaw Monument, Cleadon water tower and Cleadon Mill).
  - Development would represent clear encroachment into open countryside on a prominent approach into Cleadon village, with uninterrupted coastal and landmark views currently enjoyed by residents and visitors.
  - The Green Belt review methodology (LUC) is an in-house, non-standard methodology that is inherently subjective; different consultants might reasonably reach different results.
  - Historic Strategic Land Review ratings (pre-current Green Belt study) were inconsistent and biased against the G4 area:
    - G4 (10.4 ha) was rated amber under “protecting the Green Belt”, with the comment that development “would result in the loss of an area of Green Belt adjacent to existing built-up area”.
    - A larger site directly opposite G4 on the other side of the A1018 (13.9 ha, ref SWH021) received a red rating with stronger wording about “very negative” Green Belt impact.
    - Similar inconsistency under “enhancing green infrastructure”, where G4 was scored “neutral”, but the opposite site was scored with negative impact requiring mitigation.
- Mr Duffy highlighted the wider strategic function: Sunderland’s plan relies on South Tyneside’s Green Belt to provide the buffer between towns, and he sees no clear evidence of a robust duty-to-cooperate dialogue on the cross-boundary Green Belt function.

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#### Agricultural land issues

- The Council has treated G4 as Grade 3a “best and most versatile” agricultural land for sustainability appraisal purposes, due to lack of sub-classification data.
- Mr Duffy and Mr Bey emphasised:
  - The field has produced a productive crop every year over ~35 years.
  - The tenant farmer has indicated loss of the field could make his business marginal or potentially unviable.
  - In South Tyneside: 991 ha of agricultural land overall; each 50 ha release represents 5% of farmland and roughly “one farmer” (average 58 ha per farm across 17 farmers).
  - They argue food production is a more fundamental need than housing in the long term hierarchy of needs.

#### Solar farm to the south of G4

- Objectors stressed that the Green Belt assessment does not account for the live planning application for a solar farm immediately south of G4 (47 ha, ~61,488 panels, ~4.7 km of high-security fencing).
- They argue:
  - This proposal significantly increases the urbanisation and cumulative Green Belt harm in combination with housing at G4.
  - In the promoters’ own framework, southern G4 dwellings would look onto not only “open space” but a “huge solar farm”.
- Council and Inspector:
  - Confirmed the solar farm application is undetermined, so cannot presently be treated as committed development.

#### Church Commissioners’ position (landowner)

- They support the Council’s Green Belt evidence and moderate-harm conclusion, describing the evidence as robust and justified.
- They emphasise:
  - G4 has strong defensible boundaries (Moore Lane and Sunderland Road) and is contained by existing development to north and west.
  - Altering the boundary here is consistent with using permanent, physical features and should avoid the need for further Green Belt changes later.
  - They intend to pursue a strategic approach to Green Belt compensatory improvements across their land, working hand in hand with the Council; mitigation will be proportionate and detailed at planning application stage.

#### Action / follow-up (Green Belt & compensatory improvements – G4)

- The Inspector requested the Council, when revisiting Green Belt compensatory provision across sites, to look specifically at:
  - Options involving the Boldon Flats Local Wildlife Site (under Church Commissioners’ ownership), as proposed in the Green Belt study and Green & Blue Infrastructure Strategy.
- The Council agreed to:
  - Review compensatory improvement wording and options for G4, including explicit reference to Boldon Flats.

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### **2.3 Wading birds and habitat regulations (G4 – Cleadon)**

Council evidence

- G4 lies within the 7.2 km coastal mitigation buffer but does not host any European-site qualifying features for the Durham Coast SAC or Northumbria Coast SPA.
- Wading bird study (NAT20) shows:
  - G4 is an “amber” site used by some wading bird species (e.g. lapwing observed in 2019–2020 surveys).
  - For development, additional mitigation is needed.
- NAT20 recommends that any planning application is supported by at least one additional winter (non-breeding) season of bird monitoring within 750 m of the site, including nocturnal surveys and appropriate equipment, to provide up-to-date data given that field use changes with cropping and management.

Disagreement on survey radius and wording

- Mr Butler highlighted inconsistencies between documents:
  - Council hearing statement states 750 m survey radius.
  - Statement of Common Ground (SoCG) between Council and Church Commissioners refers to 500 m “where practicable”.
- Local objectors’ concerns:
  - Given proximity to Boldon Flats Local Wildlife Site and clear evidence of breeding avocet and other waders immediately south (solar farm survey area), they consider full 750 m coverage essential.
  - They fear “where practicable” could weaken the requirement.

Clarifications / actions

- Church Commissioners clarified “where practicable” is intended to address land-access constraints on land outside their control, not to limit survey quality on their own land.
- Council confirmed:
  - The evidence-based radius should be 750 m and that the 500 m reference in the Reg 19 plan/SoCG is an error.
  - They will correct the SoCG and policy/wording to 750 m and ensure consistency with NAT20.

### **2.4 Transport, access and car-dependence – Cleadon (G4)**

Council position

- G4 has been through SHLAA and local network modelling; no insurmountable access concerns identified.
- Local Road Network Assessment shows increased queuing/delay on side-road arms but recommends a scheme to increase opportunities for vehicles to move to/from side roads, leading to:
  - A key consideration in SP7 for improving the Moore Lane / Sunderland Road staggered junction, potentially including pedestrian crossings on all arms.

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- Public transport / active travel evidence for Cleadon:
  - Multiple bus stops in the area, including one directly adjacent to G4.
  - Several services within walking distance (e.g. service 30 via Whitburn Road and A1018; service 24 South Shields–Sunderland with higher frequency).
  - Clarified that service 30 is hourly, not half-hourly (earlier reference was an error).
  - Site lies approx. 1.5 km from East Boldon Metro station, with regular services to South Hylton and Newcastle Airport.
  - Adoption of LCWIP and IDP Appendix 8 show the site adjacent to existing and proposed active travel routes.

#### Objectors' view

- Mr Bey and Mr Butler argued G4 would be highly car-dependent. Key points:
  - Bus services north–south are reasonable, but east–west links and wider connectivity (beyond Sunderland/South Shields) are poor; there are no real-time information boards at local stops.
  - East Boldon Metro is already overcrowded at peak times and car parking is at capacity; residents often unable to board.
  - There is currently no footpath on the development side of the A1018 near the site, and no safe pedestrian link along the rural stretch of Moore Lane to East Boldon Metro or to Boldon Flats.
  - Article cited in local press indicates Sunderland Road approaching Cleadon is one of the more polluted locations in South Tyneside, with nitrogen dioxide at around three times WHO guidelines (though below UK legal limits).
  - Village parking is already constrained, making walking to the village less attractive; residents will likely drive for most trips.

#### Horse/slow-moving traffic and safety

- Mr Duffy and Mr Bey highlighted:
  - The A1018 and Moore Lane are used heavily by horse riders, cyclists and pony-and-trap users (including young teenagers), alongside motor traffic.
  - The Moore Lane / Whitburn Road / A1018 junction has a history of right-turn accidents and is not designed with equestrian or non-motorised users in mind.
  - Construction traffic over an estimated 5–7 year period could create “a complete nightmare” of congestion and safety risk for vulnerable road users.
- Mr Bey also noted the A1018 functions as a key emergency response route for ambulances, police and fire engines; extra turning lanes and congestion could delay emergency vehicles.

#### Site access design

- Promoters' Reg 19 concept shows two “ghost island” right-turn lanes into G4 off the A1018, in addition to the existing right-turn into Whitburn Road, implying three closely spaced right-turn refuges within ~500 m.
- Mr Butler questioned the practicality and safety of this arrangement and the implied need to alter the 30 mph zone and widen the carriageway.

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#### Council / promoter responses and actions

- Church Commissioners confirmed:
  - A full transport assessment (multi-modal) will accompany any planning application, assessing access, parking, public transport and active travel and identifying necessary mitigation.
  - Access arrangements (number and design of junctions) will be resolved at outline/reserved matters stage; current drawings are indicative.
- Council:
  - Confirmed ongoing monitoring of air quality via diffusion tubes and annual status reports to Defra; no exceedences of legal NO<sub>2</sub> limits in the last 5 years at Cleadon sites.
  - Acknowledged car-park capacity issues at East Boldon Metro are recognised in the IDP and that they support Nexus in seeking expansion if Network Rail land can be released.
  - Indicated that upgrading bus stops, footpaths, and junctions would be considered through the transport assessment and secured via planning obligations / conditions where justified.

#### Action points – Cleadon transport

- Council to:
  - Maintain correction that bus service 30 is hourly.
  - Continue joint work with Nexus / Network Rail on East Boldon metro parking.
- Church Commissioners to:
  - Ensure a robust, multi-modal Transport Assessment is prepared at application stage, assessing: A1018 junction operations, right-turn arrangements, non-motorised user safety (including equestrians), and emergency access.

### **2.5 Social infrastructure (schools, health) – Cleadon (G4) and villages**

#### Council evidence (IDP and plan policies)

- Social infrastructure impacts will arise but are addressed through strategic policies SP2, 55, 59 and 60, and the Infrastructure Delivery Plan (IDP).
- Primary education:
  - Assessment is undertaken on a six-area basis; Cleadon is within Planning Area 6 – “the villages”.
  - IDP identifies extension potential at West Boldon Primary and Whitburn Village Primary to accommodate planned growth across the villages; high-level feasibility has been done.
- Secondary education:
  - Assessment indicates Boldon Secondary School has potential capacity to accommodate pupils from new development in this area.
- Health:
  - Engagement with the Integrated Care Board (ICB) is ongoing as IDP is a live document.
  - Practice-level deficits have been noted (e.g. c.40 clinical rooms short across practices in the wider area), and any planning application would be referred to the ICB for contributions / facility improvements through S106/CIL.

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#### Objectors' concerns

- Mr Butler argued that for Green Belt “exceptional circumstances” the Inspector must be satisfied now that social infrastructure can reasonably support the allocations, rather than relying on later case-by-case mitigation:
  - Cleadon Academy (primary) is reported as having no spare capacity in IDP summary tables; expecting children from G4 to attend West Boldon or Whitburn primaries is unrealistic in terms of travel patterns and community cohesion.
  - Parents expect local primary provision; sending Cleadon children to other villages is likely to be resisted and would increase travel.
- Health services:
  - Current evidence shows a 40-room deficit across local practices; one East Boldon practice has previously closed to new patients.
  - There is no GP practice in Cleadon village itself; development at G4 would increase demand without on-site provision.
  - Objectors are concerned about real-world timing and reliability of Section 106/ICB interventions and fear a significant lag between population growth and capacity increase.

#### Promoters' view

- Church Commissioners believe:
  - The plan's strategic policies and IDP are sufficient to secure necessary infrastructure; repeating them in site key considerations risks duplication and confusion.

#### 2.6 Document nomenclature and clarity (G4)

- Mr Duffy highlighted multiple inconsistent labels for the same site in different documents (G4, SBC051, Action Plan 5, Field 78, Area 25, West Hall Farm, and sometimes “Land at North Farm”).
- He argued this causes confusion for residents and even consultants (e.g. LUC report's chapter heading “Land at North Farm” when the site is West Hall Farm).

No specific action was recorded, but the point is noted in the Inspector's record.

#### 2.7 Whitburn – Whitburn Lodge and Shearwater (G5 & G6)

##### Green Belt and setting

- G5 and G6 are within Green Belt parcel WH1, alongside adjacent fields; the Green Belt study gives moderate harm for purposes 1–3 and low for purpose 4, mirroring Cleadon's moderate classification.
- Key site considerations and frameworks seek:
  - Retention of trees and hedgerows.
  - Creation of defensible boundaries.
  - Protection/enhancement of the coastal setting.

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#### Neighbourhood Forum view (Mr Lavell)

- Whitburn Lodge (G5):
  - The Forum has engaged “for many years” with the landowner and prospective developer, and accepts there is a need to improve the derelict lodge site.
  - However, wastewater capacity at Hendon wastewater treatment works has been a “stumbling block” to progressing development:
    - Hendon WwTW is landlocked: Hudson Dock to north, North Sea to east, main railway to west, and Hendon Beach to south, with no obvious room for major expansion.
- G6 (between Whitburn Lodge and Shearwater):
  - This land forms part of a designated wildlife corridor and functions as a physical ecological linkage to the coast; Forum strongly opposes its development.
  - They fear G6 would physically block the corridor and undermine the coastal park’s wildlife connectivity.

#### Durham Coast SAC / SPA and wading birds (Whitburn)

- Council restated HRA findings (as per Day 1):
  - G5 and G6 are ~400 m from the SAC vegetated sea-cliff habitat, separated by Whitburn Coastal Park, which acts as a significant buffer.
  - HRA appropriate assessment concludes “no adverse effect on integrity” of the SAC/SPA, provided mitigation is secured; evidence shows urban edge impacts (fly-tipping/trampling) are localised and not adjacent to these allocations.
- Additional wading bird surveys (as for G4) are required to refine baseline and mitigation at application stage.
- The Inspector noted that the Butler & Goddard study on sewage and bird populations, mentioned previously, is not referenced in the HRA bibliography and asked the Council to consider whether that and any other relevant literature should be incorporated into the evidence.

#### Neighbourhood Forum challenge (Northumbrian Water assurances)

- Mr Lavell expressed scepticism about Northumbrian Water assurances on smart-flow improvements and reduction of sewage spills:
  - Given Hendon WwTW’s physical constraints, he doubts there is realistic capacity for significant enhancement and wants ongoing engagement with Northumbrian Water, the Environment Agency and Ofwat.

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Sustainable location and services (Whitburn)

Council position

- G5/G6 are considered well related to Whitburn's services, with a genuine choice of modes:
  - Bus: E1 & E2 stop directly opposite the sites on the A183, with E6 on Lizard Lane; half-hourly connectivity to Sunderland and South Shields and access to Whitburn local centre.
  - Active travel: LCWIP and IDP show proposed active travel routes adjacent to the sites.
  - Distances:
    - ~400 m to nearest convenience store.
    - Just over 1 km to Whitburn GP surgery (accessible by bus).
    - <200 m to Marsden Primary School.
    - ~1.1 miles to Whitburn Academy, served by two bus routes.
  - Whitburn local centre is described in the retail study as "highly vital and viable", performing very well in meeting local needs.

Neighbourhood Forum concerns

- The sites lie at the extreme northern tip of Whitburn:
  - Approximately 1 mile from village centre, seen as too distant and isolated for older residents; major retirement developers (e.g. McCarthy & Stone) reportedly declined interest due to poor proximity to facilities.
  - No nearby Metro station; residents needing to commute beyond Sunderland/South Shields will likely rely on the car.
- Health/dental access:
  - Whitburn GP is within reach, but dental provision has relocated to Southwick, requiring two bus journeys for older residents from Whitburn Shearwater area.
- Overall, Forum expects G5/G6 to function primarily as a car-dependent commuter enclave, adding to peak-time bottlenecks at village exit and along the coast road.

Wildlife corridor and design (G6)

- Council confirmed G6 is wholly within an identified wildlife corridor; G5 is excluded from the mapped corridor as the methodology removed already-developed land parcels.
- Key design / mitigation considerations include maintaining and enhancing corridor functions, careful layout to keep open space / habitat along the corridor line, and integration with Whitburn Coastal Park and coastal path.

### 3. Key statements and actions (by party)

#### 3.1 Inspector (David Spencer)

Key statements

- Explained that his role is to understand why parties consider the plan unsound / unlawful and what modifications are sought, with a clear focus on whether sites should be deleted or modified.
- Confirmed he has visited Cleadon and Whitburn sites and will likely revisit, asking objectors to identify particular vantage points (e.g. from Moore Lane, Sunderland Road, within G4) to consider in his site inspection.

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#### Key actions

- To reflect on document management concerns and, if necessary, discuss with Programme Officer.
- To consider whether G4 and G5/G6 Green Belt harm should be regarded as higher than “moderate”, in light of evidence on openness, views and separation between settlements.
- To review Council’s forthcoming work on Green Belt compensatory improvements, including specific potential at Boldon Flats.
- To review HRA bibliography and any additional evidence, including the Butler & Goddard study on sewage and bird populations, once the Council has clarified its relevance.

### 3.2 South Tyneside Council

#### Key statements

- Asserted that document handling for the examination is typical and not unusually complex, though acknowledged the volume of documents.
- Defended the Green Belt review methodology and moderate harm rating for G4 and Whitburn parcels, and emphasised use of strong, permanent boundaries.
- Confirmed assumption that G4 is best and most versatile agricultural land (Grade 3a) in sustainability appraisal.
- Confirmed G4 and G5/G6 are within 7.2 km mitigation buffer and wading bird surveys have informed key considerations requiring updated data at application stage.
- Maintained position that both Cleadon and Whitburn allocations are well served by public transport and have active travel opportunities.
- Confirmed no NO2 legal exceedences at Cleadon diffusion tube sites in last 5 years.

#### Actions committed

- Correct the wading bird survey radius from 500 m to 750 m in policy text and in the Statement of Common Ground with the Church Commissioners. Responsible: Council (planning policy) in liaison with Church Commissioners.
- Re-examine Green Belt compensatory improvement package for G4 (and other sites), specifically considering measures at Boldon Flats Local Wildlife Site, in partnership with Church Commissioners and Durham Wildlife Trust. Responsible: Council (planning policy/green infrastructure), Church Commissioners.
- Continue to liaise with Nexus and Network Rail regarding potential expansion of East Boldon metro car parking (as per IDP). Responsible: Council transport team (Mr Mill) with Nexus.
- Update and maintain IDP as a live document, including school capacity and health infrastructure data, and consult ICB on planning applications for major sites. Responsible: Council infrastructure planning team.
- Consider HRA bibliography updates in light of the Butler & Goddard bird/sewage study and any further material discussed. Responsible: Council (ecology/HRA adviser).

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### 3.3 Church Commissioners (landowners / promoters)

#### Key statements

- Confirmed ownership of G4 and Boldon Flats, and intention to deliver development with proportionate, strategic Green Belt mitigation across their land holdings.
- Supported Council's Green Belt review findings as robust and justified.
- Emphasised that social infrastructure requirements are already covered by plan policies; additional site-specific wording could cause double-counting.
- Clarified that "where practicable" in wading bird survey wording is solely about access constraints on third-party land.
- For G4, confirmed anticipated delivery trajectory of 2028–2033 (~5 years build out).

#### Key actions

- Work with the Council to:
  - Update Statement of Common Ground wording on wading bird survey radius to 750 m.
  - Explore specific Boldon Flats compensatory improvements package (habitat management, boardwalks, paths, hides, interpretation etc) proportionate to G4's impact.
- Prepare robust Transport Assessment and other technical work at application stage for G4 and Whitburn sites, covering: access, right-turn lanes, active travel, public transport, and mitigation measures.

### 3.4 Local residents and forums

#### Key statements / positions

- Strong opposition from Cleadon residents (Mr Bey, Mr Duffy) and Cleadon & East Boldon Labour Party (Mr Butler) to allocation of G4, primarily on grounds of:
  - Green Belt harm (merging, openness, long-distance views).
  - Agricultural land loss and farm viability.
  - Car-dependence, junction safety, and increased traffic on already busy and polluted roads.
- Document management concerns: indexing gaps, difficulties tracking documents over a decade, potential prejudice to effective participation.
- East Boldon / Whitburn Forum (Mr Lavell) raise:
  - Support in principle for improving derelict Whitburn Lodge (G5) but strong opposition to development of G6 due to wildlife corridor importance and coastal park interface.
  - Deep scepticism about wastewater capacity at Hendon WwTW and ability of Northumbrian Water deliver promised upgrades.
  - Concern that Whitburn northern allocations will be car-dependent and remote from village core, with limited health/dental access.

#### Actions sought (from their perspective)

- Removal of G4 from the Local Plan (primary outcome sought).
- If not removed:
  - Stronger recognition of high Green Belt harm, openness and agricultural value.
  - Firm and explicit requirements for:
    - 750 m wading bird survey radius.
    - Safe junction upgrades at Moore Lane / A1018 and constraints on multiple right-turn lanes.

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- New or upgraded footpaths (including Moore Lane–Metro link) and active travel connections.
- Clear and timely provision of school and health capacity.
- For Whitburn:
  - Exclude G6 from development; focus any development on Whitburn Lodge site with robust ecological safeguards.
  - Ensure wastewater, SAC, SPA and corridor impacts are demonstrably mitigated before allocations are confirmed.

#### **4. Topics of disagreement or conflict**

##### **1. Green Belt harm rating for G4 and Whitburn sites**

- Council / promoters: Moderate harm is justified by evidence and permanent boundaries.
- Residents / Forum: Harm is higher; sites are critical to preventing merging, protecting openness and views; methodology is subjective and downplays impacts.

##### **2. Treatment of agricultural land and food security**

- Council: Have conservatively assumed G4 as best and most versatile land; justify loss through wider plan strategy.
- Objectors: Loss of productive farmland and impact on farm viability is underplayed; farmland and food production should be prioritised ahead of new housing allocations.

##### **3. Transport and car-dependence**

- Council: Sites are well served by bus and close enough to services/Metro to offer genuine modal choice; detailed design to follow via Transport Assessment.
- Residents / Forum: In practice, access to Metro, shops, surgeries and schools is poor; bus services, car parking and pedestrian routes are inadequate; developments will be overwhelmingly car-based and worsen congestion, pollution, and emergency response.

##### **4. Social infrastructure readiness**

- Council: Plan-wide policies and IDP plus S106/ICB engagement are sufficient; capacity can be expanded (school extensions, practice improvements).
- Objectors: Evidence of existing deficits in schools and primary care; see no concrete, funded proposals tied to these specific sites; view reliance on future negotiations as inadequate to justify Green Belt release.

##### **5. Wildlife corridor and coastal ecology (especially G6)**

- Council: Believe impacts can be managed via design, wading bird surveys and HRA-driven mitigation; HRA concludes no adverse effect on SAC/SPA integrity.
- Whitburn Forum: Consider G6 as an irreplaceable wildlife corridor; fear effective severance and over-reliance on coastal park as a buffer; sceptical of water industry assurances.

##### **6. Document management and accessibility**

- Residents: View incomplete index and volume of material as a barrier to participation that could prejudice the examination.
- Inspector / Council: Acknowledge volume but see process as broadly in line with other Local Plan examinations; willing to reflect but no systemic failure identified at this stage.

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#### 5. Consolidated list of key actions, with responsibilities

Action	Description	Responsible party	Status (per hearing)
Review examination document indexing/management	Reflect on concerns about incomplete index and difficulty accessing documents; consider any procedural improvements via Programme Officer.	Inspector (David Spencer), Programme Officer, Council	Inspector to reflect; no specific change committed.
Revisit Green Belt compensatory improvements – G4	Re-examine Green Belt compensatory improvement strategy for G4, including explicit options at Boldon Flats Local Wildlife Site (paths, boardwalks, quiet areas, hides, interpretation), in partnership with landowner and Durham Wildlife Trust.	South Tyneside Council; Church Commissioners; Durham Wildlife Trust	Agreed in principle; details to be developed.
Correct wading bird survey radius	Amend Reg 19 policy text and Statement of Common Ground to state 750 m radius for wading bird surveys (instead of 500 m) for G4 and ensure alignment with NAT20.	South Tyneside Council; Church Commissioners	Council accepted correction; to be implemented.
Clarify “where practicable”	Keep wording “where practicable” limited to land access constraints beyond Church Commissioners’ control; ensure survey scope is otherwise robust and comprehensive.	Church Commissioners; Council	Clarified at hearing; to be reflected in revised drafting.

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Prepare robust Transport Assessment for G4	At application stage, provide a multi-modal TA including: junction capacity and safety (Moore Lane/A1018, Whitburn Road), right-turn lane strategy, construction traffic, non-motorised users, and emergency access.	Church Commissioners (promoter), their transport consultants	Commitment in principle; future application stage.
Footpath and active travel link options – G4	Explore footpath and cycle links from G4 south-west to Moore Lane (and on towards East Boldon Metro/Quiet Lane proposal) and north-east into Cleadon village, to reduce car dependency.	Council transport/planning teams; site promoter	Raised by Mr Butler; Council acknowledged routes; detailed design at application/IDP stage.
Metro capacity and parking	Continue lobbying and technical work with Nexus/Network Rail to expand East Boldon Metro parking and support Metro capacity improvements, as flagged in IDP.	Council transport team (Mr Mill); Nexus; Network Rail	Ongoing.
Update HRA evidence base	Consider adding Butler & Goddard and any other relevant studies on sewage and bird populations to the HRA evidence base and clarify their implications for coastal allocations.	Council (HRA/ecology); Inspector to review	Requested by Inspector; Council to respond.
Maintain live IDP and liaise with ICB	Keep IDP updated with latest school and health capacity data; ensure ICB consulted on major applications and appropriate mitigation (e.g. contributions, new clinical rooms) is secured.	Council infrastructure team; Integrated Care Board	Ongoing process.

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Wastewater constraints at Hendon	Engage (Forum wishes) with Northumbrian Water, Environment Agency and Ofwat over realistic improvement options at Hendon WwTW given landlocked site; ensure plan/allocations take capacity limits into account.	Northumbrian Water; Council; regulators; Whitburn Forum seeking involvement	Forum requested engagement; no formal action recorded, but Inspector noted concern.
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## 6. Risks, concerns and blockers raised

Below is a consolidated list of risks/concerns/blockers discussed, grouped by theme.

### 6.1 Procedural and evidence risks

- Incomplete and confusing document indexing, risking reduced public understanding and potential prejudice to examination fairness.
- Multiple inconsistent site names/codes (G4 / SBC051 / “Land at North Farm” etc.), causing confusion for public and possibly consultants.
- Perceived subjectivity and potential bias in Green Belt methodology and early site scoring (SLR vs current study).

### 6.2 Green Belt and landscape risks

- Loss of critical separation between South Tyneside and Sunderland; narrowing of the open gap by ~600–700 yards at G4.
- Cumulative urbanisation of the Green Belt if G4 housing is combined with a large solar farm to the south.
- Loss of long-distance views (coast, Cleadon Hills, Penshaw Monument, Cleadon windmill) and change to the rural character of Cleadon’s southern approach.
- At Whitburn, risk that G6 development would sever a key wildlife corridor between inland habitats and the coastal park/SAC.

### 6.3 Agricultural and rural economy risks

- Loss of productive farmland in G4, with tenant farmer’s livelihood reportedly at a marginal tipping point if the field is lost.
- Broader cumulative impact on limited agricultural land resource in South Tyneside (991 ha total; each 50 ha release ~5% and equivalent of one average farm).

### 6.4 Ecology and HRA risks

- Incomplete integration of emerging evidence (e.g. Butler & Goddard study) on sewage treatment and bird populations into HRA.
- Risk that insufficient wading bird survey radius (if limited to 500 m) would underestimate usage of fields linked to Boldon Flats and coastal sites.
- Potential under-recognition of the ecological function of G6 as part of a wildlife corridor and buffer to the Durham Coast SAC, especially if combined with increased human disturbance.

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### **6.5 Transport and road safety risks**

- Increased congestion and queuing at:
  - Moore Lane / A1018 / Whitburn Road junction, already prone to delay and right-turn collisions.
  - Cleadon village centre junctions (Cleadon Lane / A1018), where modelling indicates arms operating above theoretical capacity at peak.
  - East Boldon and A184 corridor as extra traffic from G4 heads to A19.
- Construction traffic impacts over a multi-year build period, with potential severe congestion and safety risks for pedestrians, cyclists and equestrians.
- Introduction of multiple ghost-island right-turn lanes on a key emergency route (A1018), potentially impeding emergency vehicles.
- Continued absence of a direct and safe footpath along Moore Lane to East Boldon Metro, and along the development side of the A1018, reinforcing car-dependence.

### **6.6 Public transport and active travel risks**

- Limited real-world attractiveness of bus/Metro options due to:
  - Hourly bus services in parts of Cleadon.
  - Overcrowded Metro services at peak times and constrained parking at East Boldon.
  - Lack of information displays at bus shelters.
- At Whitburn, the northern allocations' distance from village centre and absence of Metro, leading to likely reliance on cars for work and services beyond the immediate corridor.

### **6.7 Air quality and climate risks**

- Reported nitrogen dioxide levels on Sunderland Road approaching Cleadon being around three times WHO guideline (though within legal limits), with concern that traffic from G4 would worsen pollution and health risks.
- Perceived inconsistency between climate/air-quality objectives and allocating car-dependent edge-of-settlement sites.

### **6.8 Social infrastructure risks**

- Primary schools:
  - Cleadon Academy reportedly at or over capacity; risk that children from G4 would be forced to attend distant schools (West Boldon, Whitburn), increasing travel and undermining community cohesion.
- Health services:
  - Existing 40-room deficit across local practices; no GP in Cleadon village; risk of longer waiting times and travel distances for new residents.
  - Dental provision for Whitburn residents moved to Southwick, requiring multi-stage bus journeys.

### **6.9 Wastewater and coastal water quality risks (Whitburn)**

- Physical constraints at Hendon WwTW (landlocked configuration) potentially limiting ability of Northumbrian Water to improve capacity or reduce storm overflows as promised.
- 1. Risk that allocations at Whitburn (G5/G6), combined with wider growth, will increase loading on already constrained wastewater systems discharging to the Durham Coast, with implications for bathing water quality and coastal ecology.

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