

# **THE SOUTH TYNESIDE LOCAL PLAN**

## **SITE ALLOCATIONS TOPIC PAPER**

**AUGUST 2019**



**To find out more about the Local Plan, please contact:**

Spatial Planning Development Services

South Tyneside Council Town Hall and Civic Offices,

Westoe Road South Shields,

NE33 2RL

Telephone: **(0191) 424 7688**

E-mail: [local.plan@southtyneside.gov.uk](mailto:local.plan@southtyneside.gov.uk)

Visit: [www.southtyneside.gov.uk/planning](http://www.southtyneside.gov.uk/planning) If you know someone who would like this information in a different format contact the communications team on (0191) 424 7385

## CONTENTS

1. The Local Plan Site Selection Process .....	1
2. Evidential sources .....	4
3. The Housing Site Selection Process .....	11
4. The Employment Site Selection Process .....	20

# THE LOCAL PLAN SITE SELECTION PROCESS

## INTRODUCTION AND CONTEXT

- 1.1 This paper sets out how we have assessed potential housing and employment development site options to ensure that housing and employment sites selected for allocation in the Local Plan will deliver the Spatial Strategy and the Vision and Objectives and are consistent with national policy. The paper provides clarity and transparency both as to the process of how the Local Plan has allocated sites why each Local Plan site has been selected and also as to why reasonable alternatives have not been selected. Proposals have also been informed by the evidence base compiled to date. This is discussed in more detail in Section 2. Appendix 1 details the sites that have been selected for allocation. Appendix 2 details the sites that have been discounted as housing sites.
- 1.2 The site selection process has been led by our Spatial Planning team. However, it is important to note that a range of our teams have contributed to the process. These include the following:
- The Transport Strategy team; and
  - The Housing Strategy team; and
  - The Highway and Infrastructure team; and
  - The Green Spaces team
  - The Public Health team; and
  - The School Places Planning team; and
  - The Development Management team; and
  - The Environmental Protection team; and
  - The Property Management and Valuation team
- 1.3 For example, considering our initial draft selection of potential housing sites, we held meetings with officers from the Transport, Housing, Green Spaces, Environmental Protection and the Highway and Infrastructure teams to discuss both the suitability of the sites and the potential mitigation for them. By mitigation we are referring to the 'shopping list' of policy requirements that are needed for some sites in order to ensure that the impact of their development will be mitigated. In addition we have also liaised with Highways England, Northumbrian Water, the Environment Agency, Northern Powergrid, the Coal Authority, the NHS South Tyneside Clinical Commissioning Group and Sport England when considering the suitability of and infrastructure requirements for potential development allocations. As documented in our *Duty to Co-operate* paper (2019) we have also liaised with adjoining authorities regarding any cross-boundary issues that may arise.

### NATIONAL PLANNING POLICY CONTEXT

---

- 1.4 The National Planning Policy Framework (NPPF) includes the following requirements for releasing land for development:
- The identification of land for development should be consistent with objective of achieving sustainable development; and

- The prioritisation of land that is well served by public transport and where there are opportunities to promote walking and cycling in order to promote healthy lifestyles and to minimise reliance upon the private car; and
- The giving of substantial weight to the value of using suitable brownfield land and promote the development of underutilised land; and
- Allocating land with the least environmental or amenity value; and
- The identification of land to accommodate at least 10% of the housing requirement on land that is less than 1ha.

1.5 Plans should be prepared positively, in a way that is aspirational but deliverable. This means that there should be a realistic prospect that development will be delivered on allocated sites over the plan period. The importance of delivery is further emphasised by the following:

- The need for local planning authorities to achieve a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement; and
- The need for local planning authorities to apply the Housing Delivery Test (a measurement of the number of homes delivered in a local authority area against the number of homes required).

## **THE SPATIAL STRATEGY**

---

1.6 Our preferred Spatial Strategy to 2036 (Policy S1) is set out in the emerging Local Plan. The Spatial Strategy has provided a key point of reference in the allocation of sites. Of particular relevance is the strategy of balanced urban growth with the majority of development focused to the Main Urban Area of South Shields, Hebburn and Jarrow (point (a) of the Policy) and securing the sustainability of our Villages, Cleadon, West Boldon, East Boldon and Whitburn by supporting growth which respects the distinctive character of the villages (point (b) of the Policy).

1.7 In choosing the preferred option for the Spatial Strategy, the constrained nature of South Tyneside land availability, including the national planning constraint of the Green Belt, has meant that challenging spatial options have had to be considered to enable the Borough to meet its identified needs. From the outset four spatial options were identified to distribute of housing need in the Plan. These are:

1. Urban areas only – i.e. a no Green Belt Option
2. Neighbouring authorities taking our need which necessitates no or fewer GB releases.
3. Sustainable Urban Area Growth and Large-scale Green Belt release
4. Sustainable Urban Area Growth and dispersed Green Belt releases.

1.8 Sustainable development is central to the NPPF and achieving sustainable patterns of development is one of the fundamental aims of the planning system. The Green Belt is one of the planning tools used to achieve this aim. Local Planning Authorities should review Green Belt boundaries and consider the role of the Green Belt in promoting sustainable patterns of development. There may be instances where protecting the Green Belt may actually contribute to unsustainable patterns of development i.e. channelling development to more unsustainable locations beyond a Green Belt boundary. Therefore, the role of the Green Belt in influencing and sustaining sustainable development patterns should be considered as part of the Plan preparation process.

- 1.9 The Sustainability Assessment (2019) assessed the reasonable spatial options and has shown that each option could have an impact on sustainability which could require mitigation through the Plan process; the degree of mitigation which would be required would vary depending on each of the spatial options.
- 1.10 Following the assessments of four reasonable options, Option 4 which is Sustainable Urban Area Growth and dispersed Green Belt releases considered to be, on balance, an appropriate option and one that should be taken forward into the South Tyneside draft Local Plan. It is considered that this option would provide a more appropriate option for meeting our housing need for the Borough over the full Plan period and would support the vitality of our existing town and village centre by distributing growth throughout the Borough.
- 1.11 Option 1 ((Urban areas only – i.e. a no Green Belt Option) and Option 2 (Sustainable Urban Area Growth and Large-scale Green Belt release) were not considered to be suitable spatial strategies. Option 1 would be unable to deliver our full housing need in the urban area and could lead to future pressure on Green Belt land to deliver our unmet need. The delivery on sites in the urban area could support a number of sustainability objectives, however, the concentration of development would likely result in pressure on existing services and have a negative effect on existing communities. Option 3 would result in the loss of a large area of Green Belt land which could have a significant effect on the character of the area and purposes of the Green Belt, to greater extent than Option 4. Housing delivery would also be reliant on significant upfront infrastructure and mitigation which could result in uncertainties and delays in delivering housing growth the early years of the Plan. The concentration of a significant proportion of housing in one area could also limit the Plans ability to achieve economic benefits throughout Borough.

## 2. EVIDENTIAL SOURCES

2.1 A range of evidential sources have informed the site selection process. It is essential that evidence is kept up to date to ensure that it remains robust. As evidence is reviewed this Topic Paper will be updated accordingly. It is important to note that there are a number of inter-dependencies between these evidence sources which means they cannot be read in isolation. There may also be cases where the findings from one conflict with the findings of another. In determining which sites are suitable for development allocation, we have had to make a balanced judgement fully informed by the full range of individual evidential sources and the degree to which any conflicts can be mitigated.

### *The Strategic Housing Land Availability Assessment (SHLAA) (2019)*

2.2 The primary role of the SHLAA is to identify and assess sites that may have the potential to provide for housing in South Tyneside to support the delivery of sufficient land to meet the community's housing needs. The SHLAA does not allocate land for housing, grant planning permission or determine if land should be allocated for housing but is an evidence base that helps inform site allocations in the Local Plan. The SHLAA reflects a 'snapshot' in time. To ensure robustness it will be reviewed annually and changes that have taken place may change the assessment of a site.

2.3 The SHLAA report identifies a supply of specific deliverable sites for the first five years of the plan and a supply of specific developable sites for years 6-10 and 11-15 years. The SHLAA identifies all sites in the Borough with potential for future housing development, assessing their suitability, availability and how soon development could reasonably be achieved, as well as making assumptions of how many homes they could yield if they were to be ultimately developed for housing.

### *The South Tyneside Density Study (2018)*

2.4 The South Tyneside Density Assessment Report looks at current housing densities across the Borough and where higher densities may be achieved in the future.

### *The Employment Land Review (ELR) (2019)*

2.5 The purpose of the ELR is to provide an understanding of:

- The Borough's current position with respect to employment land supply; and
- The anticipated future growth trajectory of the Borough's economy and the implications of this with respect to demand for employment land over the period 2020 – 2036.

2.6 The ELR includes site specific assessments of sites that are currently available for employment use in the following categories: General Employment Sites, Specialist Employment Sites - Port and Marine Access, Specialist Employment Sites - Advanced Manufacturing and Potential Employment Sites. Included in the assessment of each site is a recommendation for the Council e.g. 'Council to consider allocation for employment' / 'Council to consider allocating for employment as part of Green Belt Review etc. As with the SHLAA, the ELR does not itself allocate sites but forms part of the evidence base. The ELR provides information which assists in understanding the achievability of available employment sites such as their market attractiveness.

### ***The Sustainability Appraisal (SA) of Local Plan sites and policies (2019)***

- 2.7 The Sustainability Appraisal (SA) is a process which is undertaken alongside the preparation of the Local Plan. The SA incorporates the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. It ensures that potential environmental effects are given full consideration alongside social and economic issues. The SA aims to promote sustainable development by assessing all policies and alternatives against a set of Sustainability Objectives; this assessment helps to identify conflicts and can lead to mitigation measures being introduced. The process aims to ensure plans and policies achieve sustainable development. The SA is an iterative process and is repeated throughout the plan preparation process.
- 2.8 All sites in the Strategic Housing Land Availability Assessment (SHLAA) have been subject to a site-specific SA. This followed on from an SA of sites as part of the Strategic Land Review (SLR) process. The SA for the SLR sites was consulted upon alongside the SLR consultation and ran between May and July 2016. To ensure all options have been considered in the plan preparation process, further SA assessments have been undertaken on all sites including those that have come forward since the SLR consultation in 2016. The process aims to show the sustainability credentials of each site considered as part of the Local Plan process and to highlight any issues which are likely to require mitigation. In addition to being the subject of a site-specific SA which provides a baseline assessment, sites that are proposed to be allocated in the emerging Local Plan have been the subject of a site-specific SA that assesses the site 'as it would be' with the application of the mitigation for development that would be required by the relevant site allocation policy.
- 2.9 The draft Local Plan includes policies which identify sites for housing and economic development; these policies have also been subject to a Sustainability Appraisal and again assessed against the Sustainability Objectives. The Local Plan policies have also been considered alongside 'reasonable alternatives' and a baseline 'no plan' situation. Reasonable alternatives are the realistic options which are considered in developing plan policies, they must be realistic and deliverable and sufficiently distinct from the Local Plan policies. The SA outlines the reasons why the preferred option was selected and why rejected options were not taken forward.
- 2.10 Following consultation on the draft Local Plan, a further SA document will be produced to support the Local Plan which is submitted to the Inspector. At this stage any modifications and amendments to policies which have occurred following consultation will be assessed against the SA objective. The final SA report will be submitted to the Planning Inspector alongside the Local Plan.

### ***The Habitat Regulations Assessment (HRA) (2019)***

- 2.11 A Habitat Regulation Assessment is required to demonstrate that a plan or project will not have an adverse effect on the integrity of a European Protected Site. The process seeks to identify any potential 'likely significant effects' (LSE) which may impact upon the designated site, either alone or in-combination with other plans and projects. Where it is deemed that adverse impacts cannot be ruled out, the plan or project must not proceed unless exceptional circumstances exist.



- 2.12 The assessment seeks to meet the requirements of the Habitats Directive (1992) and the Wild Birds Directive (2009), which are transposed into British legislation through the Conservation of Habitats and Species Regulations 2017. These referred to as the ‘Habitats Regulations.’
- 2.13 South Tyneside’s coast has two designated European Sites: Durham Coast Special Area of Conservation (SAC) and Northumbria Coast Special Protection Area (SPA)/Ramsar site. The citation for the site explains that this SAC protects the only example of vegetated sea cliffs on magnesian limestone exposures in the UK and supports a unique mix of vegetation not found elsewhere in the UK. It is highly sensitive to impacts that change the conditions of the site, including nutrient enrichment and direct habitat damage.
- 2.14 The Northumbria Coast is classified as a SPA and listed as a Ramsar site for its wading bird species. It is designated for two species of wintering waterbirds, Turnstone and Purple Sandpiper. The key concern for South Tyneside with respect to bird disturbance relates to wintering Purple Sandpiper and Turnstone. Disturbance is predominantly caused by visitors to the coast undertaking recreational activities (walking, dog walking, fishing etc.). The presence of dogs off the lead is a key issue in generating bird disturbance. There is potential for disturbance to have an impact for these species, and both species are suffering declines around the UK.
- 2.15 A HRA has been undertaken early in the Plan preparation process to identify the potential effects of housing growth, as identified in the Strategic Land Review (SLR). The HRA considered that potential impact of recreational disturbance caused by housing within 6km of the coastal designation. This area is considered to generate the most visitors and dog walkers to the coast. The study concluded that the housing sites identified in the SLR could result in an 8% increase to visitors to the coast; therefore generating a likely significant effect on the European sites.
- 2.16 With regard to the Local Plan, an HRA has been undertaken to ensure that the effects of growth delivered through the plan are identified and appropriately mitigated.

### ***The Strategic Green Belt Review (2019)***

- 2.17 Whilst the Green Belt was established to help prevent the spread of urban development within the area, national planning policy requires local authorities to ensure that there is a supply of deliverable housing site to meet housing requirements and that enough land is available to support the needs of businesses. The following three documents comprise the Green Belt Review:
- The *Stage One Green Belt Review: Exceptional Circumstances*, which establishes whether there is a strategic need to review Green Belt boundaries in the Borough; and
  - The *Stage Two Green Belt Review: Site Assessments*, which reviews how all parcels of Green Belt in the Borough, perform against the 5 purposes of Green Belt.
  - The *Stage Three Green Belt Review: Site Specific Exceptional Circumstances*, which shows how we have assessed ‘exceptional circumstances’ for sites that require a revision to a Green belt boundary.
- 2.18 The Green Belt review does not itself determine whether or not land should remain or be included in the Green Belt. Rather, it appraises parcels of land against the purposes of the Green Belt. It does not appraise the suitability of sites for development, or take into account other

potentially physical policy constraints, such as flood risk, ecology, heritage, etc. These issues are dealt with separately through other evidential work that will support the Local Plan. The review is therefore a technical document that is used to aid decisions on where the Green Belt may be amended, if necessary, to accommodate future development requirements.

### ***The Landscape Character Study (2012)***

- 2.19 The Landscape Character Study presents a detailed review of the landscapes of South Tyneside, and the means by which their distinctive characteristics can be maintained and enhanced. The study is intended to provide a greater understanding of the local character and context of the built and natural environment of the Borough. Part I of the study is the landscape character assessment, which describes and classifies the landscape, townscape and seascape of the Borough. It provides a hierarchy of local character areas and land use types. Part II presents guideline for the development and management of these landscapes. Part III deals with the application of planning policy to landscape, with specific references the Green Belt, protection of locally important landscapes and wind power developments. Although the study does not specifically reference the allocation of potential housing sites, it complements the Green Belt Review in aiding understanding of their landscape context.

### ***The Strategic Flood Risk Assessment (SFRA) / Flood Risk Sequential Test and Exception Test (2019)***

#### The Level 1 Strategic Flood Risk Assessment Report (2018)

- 2.20 A Strategic Flood Risk Assessment (SFRA) is a study to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk. The SFRA Level 1 Report provides the baseline technical report for assessing flood risk at a strategic level in South Tyneside and is sufficiently detailed to allow the application of the Sequential Test.

#### The Level 2 Strategic Flood Risk Assessment – Site Screening: Level 2 Report (in progress)

- 2.21 The Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the necessary development. A Level 2 SFRA Site Screening Report is being undertaken to assess the sites within flood risk areas, which the authority is considering allocating, in greater detail.

#### The Flood Risk Sequential Test (in progress)

- 2.22 The NPPF states that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk. A sequential, risk-based approach to the location of development should be applied in the preparation of Local Plans (NPPF paragraph 157). The aim is to minimise the risk from flooding. Development should not be allocated if there are reasonably available sites appropriate for the proposed allocation in areas with a lower probability of flooding (NPPF paragraph 158).

#### The Flood Risk Exception Test

- 2.23 The Exception Test is applicable if, following application of the Sequential Test; it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding. For the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared (the first part of the Test); and
- A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall (the second part of the Test).

2.24 Both elements of the test will have to be passed for development to be allocated or permitted. The Sequential Test will determine whether or not the Exception Test is required.

### ***The Infrastructure Delivery Plan (IDP) (2019)***

2.25 The fundamental purpose of the IDP is to assess what current infrastructure there is in the Borough, what is being planned with committed investment and what will be needed in the future to accommodate the growth requirements proposed through the emerging Local Plan. The emerging Local Plan sets out the policies and allocations to meet the Borough's development needs over the period 2021 to 2036. The IDP identifies the infrastructure required to support the delivery of the Local Plan policies and site allocations. The process of producing the IDP is a highly iterative process and will continue to be monitored and updated as the emerging Local Plan progresses.

2.26 As such it is informed by a wide range of evidence including contributions from our Public Health, Transport Strategy, Environmental Protection and Greenspaces teams as well as external stakeholders such as the South Tyneside NHS Clinical Commissioning Group and Northumbrian Water.

### ***Highway Modelling***

2.27 The information provided for the IDP in the context of travel infrastructure has been informed by three highway modelling exercises undertaken respectively by a partnering local authority, transport planning consultants and Highways England to gain an understanding of the impact of the development of potential housing sites on the highway network. The Council, as part of the development of the Local Plan, has created a local transport model in partnership with external consultants (Systra). Systra have undertaken a comprehensive traffic modelling exercise to model the impacts of all of the draft residential and employment allocations. This exercise assisted in identifying 'traffic hotspots' where mitigation will be needed and also assisted in informing the phasing of housing delivery. Further to this, Highways England has their own strategic highways model to identify the capacity of the strategic road network and how the network could be impacted by development and associated congestion as a result of emerging Plans in the sub-region including the South Tyneside emerging Local Plan. The highway modelling is an ongoing and iterative exercise which will continue to inform the development of the emerging Local Plan.

### ***Whole Plan Viability Assessment (in progress)***

#### Development Viability – Policies

2.28 External consultants have been instructed by South Tyneside Council to provide evidence regarding the impact on development viability of the policies in the emerging Local Plan over the Local Plan period (2021 to 2036), and to undertake a viability assessment into the potential introduction of a Community Infrastructure Levy (CIL). The work provides an update and builds

upon the work undertaken by DTZ in 2014 through the CIL Viability Assessment. The purpose of viability testing is to ensure that the policies and site allocations in the Local Plan are viable and therefore deliverable.

- 2.29 It is important that that this work is informed by the development industry. A workshop was held on 1st May 2019 with developers, landowners and agents active in the Borough and participants were then sent viability questionnaires, to elicit their views on development viability in the Borough.

#### Development Viability - Sites

- 2.30 In addition to assessing development viability in the context of policies, the consultants are also assessing viability in the context of the strategic housing site allocations. To inform this exercise a total of 9 strategic housing sites (defined as sites of 100 dwellings or more) were selected from across the Borough as providing a representative cross-sample. Site promoters were then sent development viability appraisal pro-formas and invited to complete them by the 13th September 2019. The responses will be reviewed by the consultants.

#### Summary

- 2.31 The viability work is ongoing, iterative and will continue through the emerging Local Plan process. We look forward to continuing our positive dialogue with the development industry to ensure that policies and site allocations take viability into account.

#### ***The Strategic Heritage Impact Assessment Study (2019)***

- 2.32 The Strategic Heritage Impact Assessment Study seeks to provide robust and defensible evidence of the potential risk of development of the proposed site allocations in the emerging Local Plan to the significance of heritage assets and their settings. In addition to identifying the potential risks of development, and whether or not development can be justified, the study seeks to provide guidance on the opportunities and strategies for mitigating any impacts and to consider opportunities for positive enhancement or for an asset to be better revealed. It also makes suggestions about further work required and future monitoring.
- 2.33 It is intended to provide a proportionate understanding of the significance and sensitivity to change of heritage assets both within sites and those that would be affected by changes to their settings as a consequence of development. The findings of this study will provide further safeguards for the historic environment both in terms of Local Plan policies and supporting text for site allocations where potential significant effects on the historic environment have been identified.

#### ***The Strategic Land Review (SLR) (2018)***

- 2.34 In order to have a comprehensive overview of all potential development sites in the Borough a Strategic Land Review was undertaken. All potential development sites were appraised for both residential and B-class economic development. Sites within the Green Belt were assessed in the context of their potential impact on Green Belt separation. The appraisals of all sites covered landscape and townscape, biodiversity, green infrastructure, historic environment and culture, flooding, infrastructure and services, ground conditions and contamination.. Each of these categories was assessed using a red-green-amber framework - red (High Impact - significant

mitigation required), amber (Medium Impact - mitigation required), green (Zero/Low Impact - no or minimal mitigation required) and a site appraisal conclusion was made for each site - red (site is not suitable for development), amber (site is potentially suitable for development) and green (site is suitable for development).

- 2.35 The SLR was consulted was on between May and July 2016 and all comments were taken into consideration. The Final SLR was published in 2018. The SLR proved a valuable appraisal tool for providing an initial indicative overview of all sites in both a housing and economic development potential context and for providing an opportunity for developers, consultants, landowners and the wider community to comment on the site appraisal process. The SLR has, in part, been updated by the Strategic Housing Land Availability Assessment and the Employment Land Review.

### ***Playing Pitch Strategy (2015 & 2019)***

- 2.36 The Council undertook a Playing Pitch Strategy (2015) followed by an update in 2019. The Playing Pitch Strategy provides a robust and up-to-date evidence base to support new planning policies. The strategy includes:

- An overview of current and anticipated sport participation and playing pitch provision in South Tyneside.
- An up to date understanding of the demand for playing pitches and playing pitch sports (Football, Rugby Union, Cricket and Hockey);
- Outline current and future demand for playing pitches and sports up to 2036 and identifies deficiencies or surpluses in provision and options for addressing these.
- Provides strategic recommendations relating to the management of sites and potential enhancement of existing sites.

- 2.37 The Playing Pitch Strategy has identified a shortfall playing pitch provision, now and in the future. It therefore recommends that playing fields in the Borough should not be deemed as surplus because of these shortfalls and should be protected via the Local Plan. Any playing field land identified for housing development would need to be compensated on a like for like basis.

### ***Open Space Study (2015 & 2019)***

- 2.38 The Council undertook an Open Space Study in 2015 which was further updated in 2019. The Open Space Study details what provision exists in the area, its condition, distribution and overall quality. It considers the future demand for provision based upon population distribution, planned growth and consultation findings. The study addresses the following open space typologies:

- Amenity greenspace
- Parks and gardens
- Natural and Semi-natural greenspace
- Children's Play facilities
- Allotments
- Cemeteries
- Civic Spaces

- 2.39 Individual sites have been assessed and awarded a rating based on their quality and value; most assessed sites in South Tyneside rate above the quality threshold and are of high quality. The

Open Space Study helps to identify standards (ha per 1,000 population) for each open space typology and for the Borough. It also includes accessibility mapping which seeks to identify open space deficiencies and gaps in open space provision throughout the Borough.

### 3. THE HOUSING SITE SELECTION PROCESS

- 3.1 The site selection process has followed a number of processes which have effectively filtered sites down.

#### **STEP 1 - DETERMINING THE REQUIREMENT FOR NEW HOMES**

- 3.2 In order to determine the minimum number of homes needed to deliver a sufficient supply of homes, the NPPF states that strategic policies should be informed by a local housing need assessment, using the 'standard method' set out within the in National Planning Guidance. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and any historic under-supply. The standard method follows a three-step process to identify a minimum annual housing need figure. Using this approach, we have determined that the minimum annual housing need figure is 350 dwellings per annum. The three-step process to derive this annual housing requirement is as follows:

- Step 1 - Setting the baseline using the national household growth projections: The household growth projections (2014-based household projections) for South Tyneside over the period 2019 to 2029 are 315 new households per annum.
- Step 2 - An adjustment to take account of affordability: Adjusting the average annual household growth figure based on median workplace affordability ratios (released March 2019). This refines the minimum annual housing need figure to 350 dwellings per annum.
- Step 3 - Capping the level of any increase: A cap may be applied which limits the increase in the minimum annual housing need figure if the figure is 40% above the figure set out in the most recent strategic documents or the household projections (whichever is the highest). The figure of 350 dwellings per annum is not 40% above either of these figures so the cap is not relevant.

- 3.3 For housing purposes, the period covered by this Plan is 1st April 2016 to 31st March 2036 against which, the 350 dwellings per annum figure is applied. This produces an overall minimum housing requirement of 7000 new homes. The household projections that inform the housing baseline (see Step 1 above) are the 2014-based household projections. We have used a base date of April 2016 for housing completions and commitments (planning permissions) in order to determine whether we have over or under provision at this point in time. The figure of 7,000 homes is the overall housing requirement i.e. it is not the same as the requirement for the number of new homes that needs to be provided through Local Plan allocations. In order to arrive at this figure we have netted off the following from the figure of 7,000 homes:

Housing completions (net) over the period 1st April 2016 to 31st March 2019	1,102
Housing commitments (gross) (the number of homes yet to be built but with planning permission) at 1st April 2019	904
Small scale windfalls (an allowance based on past delivery for homes coming forward on small sites that are not allocated in the Local Plan)	287

This produces a figure of 4,707 homes. We have then added the following to this figure.

A 10% lapse rate (an allowance for non-delivery of some planning permissions) for commitments	91
Projected demolitions / losses (this is because the housing requirement is a 'net' requirement i.e. net of losses)	138

3.4 This produces a figure of **4,936 homes**. This is the number of homes that is the Borough's 'residual' target i.e. the number that need to be provided in order to arrive at a figure of 7,000 homes over the plan period. In order to ensure the effective operation of Policy IM1 which seeks to monitor the supply and delivery of new homes and sets out contingency measures in the event of housing delivery falling below the relevant targets, it is robust to add in additional housing capacity from Local Plan allocations. For this reason we have proposed to allocate sites sufficient to deliver 5,425 homes. This equates to a flexibility buffer of 10% of the residual target. It is important to be clear that the purpose of the flexibility buffer is to ensure that the residual housing target of 4,936 homes is met i.e. it is not itself an addition to the housing requirement. We have added the flexibility buffer because it is established good practice to build an element of flexibility into the supply.

## **STEP 2 – ENSURING A COMPREHENSIVE BASELINE OF POTENTIAL HOUSING SITES**

3.5 The updated SHLAA (2019) has superseded the SLR in the housing site selection process. A number of other important evidential sources have inter-acted with, and informed the SHLAA, but it has provided the crucial baseline evidence, both site-specific and in relation to strategic housing numbers. An important difference between the SHLAA and the SLR is that the SHLAA does not use the 'traffic light' categorisation of sites used in the SLR. The SHLAA might assess a SLR 'red' site as deliverable and/or developable if identified constraints could be adequately mitigated.

3.6 All sites in the Borough that are considered to have potential for residential development, or which have been submitted externally are included in the SHLAA. A call out for sites was undertaken via e-mail, letter and the Council's webpage between 23rd March 2019 and 12th April 2019 inviting the submission of sites. In addition desktop survey work was undertaken. The 2019 SHLAA has been published on our website and includes full details of the methodology used. It provides a more up to date position on land supply and has been updated against more recent evidence such as the SFRA and the Green Belt Review.

## **STEP 3 – SIEVING OUT SITES WITHOUT HOUSING POTENTIAL**

3.7 Sites were only sieved out if they were significantly covered by one or more Category 1 constraints. The designations that qualify as Category 1 constraints e.g. Sites of Special Scientific

Interest are identified in the Regional SHLAA Implementation Guide (March 2008). A number of sites were sieved out of the assessment (although still mapped and recorded in the SHLAA database). Examples include:

Site	Reason for removal
Land at Newton Garths	Sites of Special Scientific Interest
Land east of Natley Avenue	Flood Zone 3b

#### **STEP 4 – ASSESSING THE SUITABILITY, AVAILABILITY AND ACHIEVABILITY OF SITES**

- 3.8 Further to the site survey process sites were assessed for their suitability, availability and achievability for housing development. In accordance with PPG, sites can be assessed against the existing development plan, national policy, emerging policy and the market and industry requirements for housing in the market area to determine a sites development potential.
- 3.9 The assessment of suitability, availability and achievability can be viewed as a step in the site selection process. However, this is not a clearly delineated stage as it has been an on-going and iterative process with the assessment of sites being updated as different evidence sources have become available. The following text under the headings suitability, availability and achievability provides an overview of how this process, which is ongoing, has been undertaken and resulted in the final draft of housing allocations.

#### **SUITABILITY**

- 3.10 The starting point for the assessment of ‘suitability’ was to take into account Category 2 designations. Category 2 designations are defined in the Regional SHLAA Implementation Guide. Examples include Allotments, Designated Open Space and Listed Buildings. A Category 2 designation may constrain the potential of a site for development but it does not necessarily result in a site having no residential development potential. An assessment has to be made on a site-by-site basis. Examples of sites assessed as unsuitable because of a Category 2 designation include:

Site	Reason assessed as unsuitable
The Greyhound Inn	Known Archaeological Remains
Temple Memorial Park	Includes 2 Local Wildlife Sites

- 3.11 The assessment of ‘suitability’ has also taken into the following factors into account: -
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk,
  - hazardous risks, pollution or contamination;
  - potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
  - appropriateness and likely market attractiveness for the type of development proposed; and
  - the contribution to regeneration priority areas.



### ***Suitability - The Council's Priorities***

3.12 The Council's priorities include seeking to re-invigorate the link between our communities and the river corridor by promoting the riverside as a high quality location for development opportunities and developing an open space strategy which balances facilitating development opportunities with the preservation and enhancement of opportunities for the Borough's residents to access open space. The assessment of site suitability has, where appropriate, taken into account these priorities.

### ***Suitability - the environmental conditions that would be experienced by residents***

3.13 Some sites are locations where residential development would be incongruous with the neighbouring land uses. This is particularly relevant in the case of locations within industrial or business park areas. Industrial areas are generally associated with activities which have the potential to impact negatively on residential amenity and which in our opinion could not be mitigated e.g. heavy industry processes and operations. For this reason a number of sites were not considered further. Examples of sites sieved out because of their incompatibility with residential amenity include:

<b>Site</b>	<b>Reason assessed as unsuitable</b>
Land at Elswick Way Industrial Estate	In industrial estate, not desirable
Land at Prince Consort Industrial Estate	In industrial estate, not desirable

### ***Suitability - Potential impacts on landscapes***

3.14 Some sites are in locations where residential development would have an unacceptable adverse impact on the landscape. An example of a site sieved out for this reason is as follows:

<b>Site</b>	<b>Reason assessed as unsuitable</b>
Land between South Eldon Street and A194	Residential development would need to be screened from the A194 which would lead to the loss of a lot of mature trees.

### ***Suitability - Open Space / Playing Pitches***

3.15 The assessment of open space is an important component of appraising suitability. A number of potential housing sources are designated as open space, with the majority continuing to be identified as such through the emerging Local Plan. In some instances, sites with open space designations have been assessed as suitable for housing in the SHLAA. However, this conclusion has only been arrived at when supported by evidence from the 2015 Open Space Study and/or the 2019 update of that study that the loss of the open space would not result in any deficit of open space in the locality. Examples of open space sites sieved out due to the 'high value' attached to the land and whether or not there is a surplus of that open space typology include:

Site	Reason assessed as unsuitable
Grange Park, Boldon	Site is a high value open space, currently used as a formal park and its loss would have high impact on local community
Open space (Burn Road), South Shields	High quality, high value amenity green space

3.16 Nevertheless, some open space sites, clearly including some that are high value, have been allocated for housing development. These are sites that are suitable for housing development in the context of the access to shops, services and facilities that would be experienced by future residents and where their development for housing would not lead to a deficit of open space within the locality. Loss of these sites can be mitigated by improving the quality and accessibility of other existing open space sites or by provision of open space within new housing developments.

3.17 A number of potential housing sites are in use as playing pitches. The majority of playing pitch sites have retained this designation in the emerging Local Plan. However, some playing pitch sites have been identified in the emerging Local Plan as housing sites. The Playing Pitch Strategy (2018) states that there is a shortfall of playing pitch provision in the Borough. Sport England are a statutory consultee for the Local Plan and any allocation of playing field land for housing will need to be compensated for by provision of equivalent or higher quality. Examples of sites assessed as unsuitable because of their playing pitch status include:

Site	Reason assessed as unsuitable
Marine Park Primary School playing fields, South Shields	School playing fields
Playing fields south of Hedworth Community Association, Fellgate	Site is sports pitches that are currently in use

### ***Suitability - Flood Risk***

3.18 The NPPF states that all plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

3.19 The starting point for assessing flood risk was to ensure that all SHLAA sites were appraised in relation to the Environment Agency’s existing mapping of flood zones. Flood Zone 3b is a Category 1 designation. Sites with a significant proportion of the site in Flood Zone 3b were removed from the site selection process. This has been balanced with the Council’s priority of re-invigorating the river corridor i.e. sites along the river corridor with a significant proportion of the site in Flood Zone 3b but have the potential to make a contribution to delivery of this priority were not removed at this stage.

3.20 The flood risk Management consultants undertaking the SFRA were supplied with mapping data for all of the potential development sites that had been identified in the Strategic Land Review. The SFRA uses the Environment Agency’s Flood Map for planning version issued in April 2018 to assess fluvial and tidal risk to potential development sites. A number of our potential

development sites were shown to be at varying risk from fluvial/tidal, surface water flooding and residual risk. Development viability assessments based on flood risk are summarised through a number of strategic recommendations within the Level 1 SFRA, which include Recommendation A - 'consider withdrawing the site based on significant level of fluvial or surface water flood risk' and Recommendation B - 'Exception Test required if site passes the Sequential Test'.

3.21 A number of sites were subject to Recommendation A. These included the following sites:

1. The former Hawthorne Leslie Shipyard, Hebburn site (assessed for mixed use)
2. The Holborn Middle Dock, South Shields site (assessed for mixed use)
3. Land East of Glencourse, East Boldon (assessed for residential)
4. Land west of Cleadon Lane, Whitburn (also known as the former Charlie Hurley Centre) (assessed for residential)
5. Land beside MH Southern, South Shields (assessed for employment)
6. Land at Cleadon Lane industrial Estate (assessed for mixed use)
7. Land adjacent Lakeside Inn, Fellgate (assessed for residential)

3.22 These sites are being assessed by flood risk management consultants through the Level 2 SFRA Site Screening Report (in progress). The allocation of sites needs to be supported by a Sequential Test for Flood Risk and, where appropriate, an Exception Test. The Sequential Test for Flood Risk is currently work in progress. It will identify whether the sites that the Council has allocated in the Pre-Publication Draft Local Plan pass the Sequential Test and whether any need to be subject to the Exception Test.

**Suitability – Heritage Impact**

3.23 All draft housing allocations were assessed in the Strategic Heritage Impact Assessment. The conclusion for all of the sites was that there would be less than substantial harm, with the exception of the following site. This site was not taken forward in the site allocation process.

Site	Reason assessed as unsuitable
Land between Downhill Lane and Hylton Lane	There would be substantial heritage impact harm

**AVAILABILITY**

3.24 The SHLAA sets out how sites have been assessed in the context of availability for development. Key points are as follows:

- Sites have only been assessed as 'available' where there is no known evidence of ownership or legal problems.
- A site's existing use has also been considered in terms of the timing of its availability. A site in active use is only considered deliverable if there is clear evidence that the existing use will cease operation within the period covered by the Local Plan.
- Where a site is not currently available and there is no clear evidence that it will become available speedily, it has been assessed as developable i.e. it will be delivered in years 6-10 or 11-15 of the plan period.
- For sites in private ownership, Officers been able to draw on information provided through the various 'call for sites' issued through the SHLAA and SLR processes and

discussions with, landowners, consultants and developers. For sites in public ownership, Officers have drawn on discussions with our Property Management and Valuation team.

### **Availability – employment land**

3.25 Included in the SHLAA is a number of sites that form part of the Borough’s portfolio of employment land, both occupied and un-developed. The Borough has an employment land requirement and the majority of employment sites are occupied and their retention as employment land is required to meet the employment land requirement. The Employment Land Review has reviewed the Borough’s employment land portfolio of available (for employment use) sites.

### **ACHIEVABILITY**

3.26 Achievability is a judgement about the economic viability of the site and the capacity of the developer to implement a scheme within a certain time period. If there is a reasonable prospect that the particular type of development site will be developed on the site at a particular point in time, then the site is considered to be achievable. Achievability will be affected by:

- market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites);
- cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and
- delivery factors – including the developer’s own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

### **STEP 5 – DETERMINING THE NEED TO RELEASE LAND FROM THE GREEN BELT**

---

3.27 Following the assessment of all housing sites, the development potential of non-Green Belt housing sites was collected to produce an indicative housing trajectory. This showed a potential realistic capacity of 3,056 units over the plan period from non-Green Belt sites against a residual need of 4,936 units. Through the SHLAA and the *Stage One Green Belt Review: Exceptional Circumstances* Report we were able to conclude that that there is an acute shortfall of housing when relying on non-Green Belt sources.

3.28 The NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Integral to this is whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and under-utilised land;
- b) Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well-served by public transport; and
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

- 3.29 The SHLAA trajectory included suitable brownfield sites and sites which would make use of under-utilised land.
- 3.30 The South Tyneside Density Assessment Report indicates that higher densities have been achieved across the Borough than those set out in the Adopted Core Strategy and sets out recommendations for encouraging higher densities in the new Local Plan. Based on the recommendations in the Density Assessment Report, the increased density thresholds were used to estimate site capacity in the SHLAA where there was no better information available. If other information on potential site capacities was available, such as information from the site's promotor or from planning permissions, this information was used rather than the standard density calculation.
- 3.31 Formal approaches were made to Sunderland City Council (August 2018), North Tyneside Council (July 2018) and Gateshead Council (December 2018) respectively to as to the degree to which each of our adjoining authorities were able to accommodate some of our housing need. As detailed in the Statement of Common Ground, all three authorities confirmed that they would be unable to provide for some of our need.
- 3.32 The *Stage One Green Belt Review: Exceptional Circumstances* Report (2019) fully details the steps that were taken which clearly evidence why exceptional circumstances exist in the context of a strategic need to release land from the Green Belt. Demonstrating a strategic need to release land from the Green Belt for development purposes is not itself sufficient to justify the release of individual sites. The *Stage Two Green Belt Review: Site Assessments* (2019) assessed individual parcels of land in the Green Belt against the five purposes of Green Belt. The review was comprehensive i.e. parcels were assessed irrespective of their suitability for development in relation to other planning considerations such as proximity to services. The assessment also considered for each parcel whether harm to the Green Belt could be minimised if it were released for development. The *Stage Three Green Belt Review: Site Selection* (2019) details the sites that the emerging Local Plan proposes to allocate for which Green Belt deletions are required. For each individual site, the assessment draws to a conclusion showing why we consider that exceptional circumstances has been demonstrated on a site-specific basis.

#### **STEP 6 – REVIEWING THE ACHIEVEMENT OF A 5 YEAR HOUSING LAND SUPPLY**

---

- 3.33 Importantly, the housing trajectory review factored in not only the total quantity of housing that could be delivered over the plan period, but the specific requirement in the NPPF to demonstrate a 5 year housing land supply for the first 5 years of the Local Plan period. This reinforces the need to make Green Belt deletions and for doing so in relation to sites that are demonstrably capable of delivering housing units in the first 5 years.

#### **STEP 7 – REVIEWING THE DELIVERABLE AND DEVELOPABLE SITES**

---

- 3.34 The site allocation process has run in parallel with the development of the spatial strategy. Having identified the need to amend Green Belt boundaries, the Sustainability Appraisal (2019) concluded that the most appropriate strategy is one of incremental increases to the existing villages rather than a single very large Green Belt deletion.
- 3.35 It is very important to ensure firmly beyond any reasonable doubt that the strategic sites which were being considered for allocation are deliverable. We used the SHLAA 'call for sites' (February 2019) to confirm and re-confirm the following:-

- There is developer interest and a willing owner and that the developer will be able to deliver the draft policy requirements for the site.
- The development capacity of the site.
- A realistic projection for the delivery of housing units on the site.

## SUMMARY

---

- 3.36 The Housing Site Selection Process section of this Topic Paper has shown how our evidence base work has guided the process including the sieving out of sites. Appendix 2 to this Topic Paper provides an overview of the assessment of sites that have been sieved out. We have also drawn on our extensive evidence base to inform the 'key considerations' set out in the Policy H3 - *Housing Allocations and Commitments* in the emerging Local Plan. This identifies the key considerations for developers where mitigation would be required because of potential impacts from development identified in our evidence base. Appendix 1 to this Topic Paper provides an overview of the assessment of the sites that are proposed to be allocated in the emerging Local Plan.
- 3.37 This section of this Topic Paper has also provided an overview of how we arrived at the conclusion that exceptional circumstances exist in the context of a strategic need to amend Green Belt boundaries and also of how we consider that exceptional circumstances has been demonstrated on a site-specific basis for the individual sites we propose to allocate which require Green Belt deletions.
- 3.38 The context for this is provided by our preferred spatial strategy (Sustainable Urban Area Growth and dispersed Green Belt releases) which section 1 of this Topic Paper provided an overview of.

## 4. THE EMPLOYMENT SITE SELECTION PROCESS

### INTRODUCTION

- 4.1 The purpose of this section of this paper is to set out the context for the employment sites that are proposed to be allocated in the Pre-Publication Draft Local Plan. It should be read alongside the Employment Land Review.

### POLICY CONTEXT

- 4.2 The NPPF states that *'planning policies should set out a clear economic vision and strategy which positively and proactively encourages economic growth ...'* The National Planning Practice Guidance sets out that there should be an assessment of the suitability, availability and achievability in an employment context to support this.

### BACKGROUND

- 4.3 To inform the emerging Local Plan, the Employment Land Review (ELR) (2019) differentiates general employment land from specialist (port and marine access) employment land. It developed the three 3 growth scenarios (Baseline Labour Demand, Policy-On Labour Demand and Past Completions) which translate into different land requirement options. The Council's preferred options are stated in Table 1 below:

<b>Land typology</b>	<b>Preferred Scenario</b>	<b>Land Requirement</b>	<b>Existing Supply</b>	<b>Available</b>
General Employment Land	Policy-On Labour Demand	30.76 ha	13.26 ha	
Port and Marine Land	Past Completions (net)	22.09 ha	40.47 ha	

- 4.4 Table 2 overleaf shows that whilst there is an overprovision of port and marine land, there remains a strategic shortfall (17.5ha) of general employment land.

<b>Table 2: Employment Land Review Findings</b>	
Port and Marine Land	Need / Supply (Hectares)
Recommended Port & Marine Land Requirements	22.09
Existing Available Supply	40.47
Under or Over Provision	+18.38
General Employment Land	Need / Supply
Recommended General Employment Land Requirement	30.76
Existing available land supply	13.26
Under or Overprovision	- 17.5

#### **BASELINE**

---

- 4.5 The ELR was undertaken by Lichfields in association with Lambert Smith Hampton (LSH). The work on the supply of employment land was by LSH. The starting point for the LSH assessment was the Borough's existing portfolio of employment land (the majority of which is identified as employment land on the Proposals Map for the Adopted Site Allocations Development Plan Document (2012)). The Council supplied maps to show this search area. Also forming part of the LSH assessment were those sites promoted by landowners / agents as being suitable for allocation for economic development. This entire category of sites is in the Green Belt.

#### **SEARCH PARAMETERS**

---

- 4.6 Within the baseline of existing employment land LSH, identified a broad range of sites with potential for economic development. These include:
- Vacant sites currently allocated for employment use;
  - Vacant sites formerly in employment use;
  - Vacant land in areas identified by the Council for mixed-use development that could include an employment component;
  - Expansion land held by business;
  - Employment premises that are at, or nearing, functional obsolescence; and
  - Land and buildings in alternative uses that may have potential for economic development.

#### **SITE ASSESSMENT CATEGORISATION AND CRITERIA**

---

- 4.7 In order to ensure consistency with the Council's approach to employment land, sites were grouped under the following headings:
- General employment sites
  - Specialist employment sites – Port



- Specialist employment sites – River Frontage
- Specialist employment sites – Advanced Manufacturing
- Mixed use sites
- Potential employment sites

4.8 LSH grouped their site assessment criteria under two broad headings – market assessment criteria and sustainability criteria.

#### ***Market Assessment Criteria***

- Access to Strategic Highway Network
- Site Characteristics & Physical Constraints
- Infrastructure
- Market attractiveness
- Barriers to Development
- Ownership Factors

#### ***Sustainability Assessment Criteria***

- Local Road Access
- Proximity to Urban Areas
- Compatibility of Adjoining Uses
- Planning Sustainability
- Sequential Status

4.9 Sites were scored from 1 to 5 (5 being the highest score) depending on how they performed against these criteria. LSH also provided comments for each site and a recommendation to the Council regarding its potential allocation in the emerging Local Plan.

### **SITE SELECTION**

---

4.10 The LSH assessment provided a robust evidential baseline. However, it has been for the Council to determine the sites that are proposed to be allocated in the emerging Local Plan.

#### ***Port and Marine sites***

4.11 Table 2 identifies an ‘over-provision’ of 18.38 ha for port and marine land in relation to the Council’s preferred scenario. The available supply of port and marine land is largely determined by the site location characteristics that are inherent to the sector. The Level 2 Strategic Flood Risk Assessment Site Screening Report includes the following site:

- Land beside MH Southern, South Shields (assessed for employment)

4.12 The recommendation for this site was ‘Due to the extents of both tidal risk and surface water flooding to the site, we recommend this site be removed from development allocation if land raising cannot be used and surface risk be managed’.

4.13 This site has been included in the allocations for general employment land in the Pre-Publication Draft Local Plan. The Sequential Test for flood risk is currently work in progress.

## General Employment sites

4.14 Table 2 also shows that there is a deficit of 17.5 ha in relation to the Council’s preferred scenario (Policy-On Demand) for general employment land. Therefore we have had to consider potential new sites for allocation for general employment land. We have decided that a larger, single site release would be more appropriate than several smaller employment sites, in order to meet the size demands for employment sites. A multiple site release was considered to be less attractive to the market and likely to result in poor attractiveness. We have therefore considered strategic employment land options to address this deficit. As detailed through in the South Tyneside Interim Sustainability Appraisal (2019), the following strategic spatial options have been considered with regard to providing employment land in the draft Local Plan.

**Table 3: General Employment Strategic Spatial Options – Reason for Inclusion**

<p><b>Option 1:</b>  <b>Employment land in Urban areas only – i.e. no Green Belt Option</b></p>	<p>To demonstrate the implications of allocating an additional 17.5ha of employment land within the Main Urban Area to avoid development within the Green Belt.</p>
<p><b>Option 2:</b>  <b>Neighbouring authorities taking our need</b></p>	<p>In-line with the NPPF, this option should be considered by the Local Authority, prior to considering the Green Belt for development.</p>
<p><b>Option 3:</b>  <b>Strategic Employment Green Belt release</b></p>	<p>To consider the impacts of accommodating a strategic employment site within the Green Belt to address the preferred option deficit.</p>

4.15 Option 1 is not deliverable because, as demonstrated through the ELR, the Borough does not have sufficient available employment land in urban areas to meet the identified need. Option 2 is not deliverable because, as documented in the South Tyneside Duty to Co-operate Statement (2019), we have approached neighbouring local authorities regarding our need but they have responded that they are unable to meet our need.

4.16 Option 3 requires the test of exceptional circumstances to be met. The South Tyneside *Stage One Green Belt Review: Exceptional Circumstances* (July 2019) demonstrated that exceptional circumstances exist in the context of a strategic need to release land in the Green Belt for employment purposes.

4.17 The test of exceptional circumstances would have to be demonstrably met in order to justify a Green Belt deletion. We consider that, given the scale of the deficit, and the importance attached by the Council to economic growth and the broader regional agenda that this reflects as demonstrated through the North East Strategic Economic Plan, this test can potentially be met. We have therefore assessed the impact that the development of potential sites would have on the five purposes of Green Belt through the Green Belt Review. The sites performed as shown in Table 4. Our preferred option is the Wardley Colliery site and this is included as an allocation in the emerging Local Plan. The South Tyneside Green Belt Review Stage provides a detailed assessment as to how we consider this site has met the site-specific test of exceptional

circumstances. Appendix 2 to the South Tyneside Site Selection Paper sets out why sites have been discounted and includes the two discounted sites in Table 4 (Land Opposite Monkton South Business Park, Hebburn (SLR Ref FG16a) and Land North West of Testo's Roundabout (SLR Ref FG18)).

**Table 4: Assessment of Potential Employment Sites**

Site address	LSH Ref	SLR Ref	Size	Lambert Smith Hampton recommendation	Council assessment	Green Belt (GB) Review (It should be noted that the GB Review does not consider the allocation of sites. It assesses the impact that potential development would have on the purposes of the Green Belt)
Opposite Monkton South Business Park, Hebburn	P3	FG16a	9.66	Council to consider allocating for employment	It is not well related to existing development and note that the GB Review states development would cause 'significant adverse effects'. Although this relates to FG17h, FG16a would still have a detrimental impact on the purposes of the GB as it is part of a landscape area which is predominantly open with long range views, part of a wildlife corridor, extends into an area which is open and green.	The site is part of a much larger parcel in the GB Review (FG17h). The GB Review for FG17h states that its development would cause 'significant adverse effects' and the area represents a key strategic gap between South Tyneside and Gateshead which must be protected.
Wardley Colliery, Follingsby Lane, Wardley	P4	FG22	16.5	Council to consider allocating for employment	A well screened brownfield site in an industrial landscape providing limited contribution to openness of the Green Belt. It is also well located in relation to the strategic highway network. Promoted by Harworth Estates for allocation. Strong candidate for allocation.	The GB Review relates only to parcel FG22d. This assessment relates to a parcel of land that has its own distinct character and has been the subject of site promotion. In summary, the scale of outward growth could be regulated as a result of established durable features, thus restricting sprawl and preventing further encroachment.
North West of Testo's Roundabout	P5	FG18	25.80	A very large site with substantial infrastructure costs. Council to consider whether it is premature to allocate for employment.	Agree with LSH recommendation and note that GB Review assesses 'adverse impact' for part of the site. Not promoted for employment and Highways England have confirmed access could not be taken direct from the A184 or a reconfigured Testos Roundabout. Infrastructure costs mean that it is unlikely to be viable.	The GB Review combines two SLR sites as FG18c. It states that the remaining Green Belt will continue to function as currently in its purposes. However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement, and would not help in preventing further sprawl going forward.

- 4.18 We consider that the only realistic potentially deliverable option is the Wardley Colliery site. However, this is notwithstanding that the Wardley Colliery site includes a Local Wildlife Site and that allocating the site would have to satisfy the NPPF's biodiversity policies. The policy in the emerging Local Plan needs to ensure that the allocation of land for economic development at this location is consistent with the need to protect, enhance and manage the Wardley Colliery Local Wildlife Site. The South Tyneside *Stage Three Green Belt Review: Exceptional Circumstances* (July 2019) sets out how we have assessed and justified making detailed boundary amendments to the Green Belt for this emerging Local Plan including for the Wardley Colliery site.

#### SUMMARY

- 4.19 The Employment Site Selection Process section of this paper has shown how evidence base work has guided the process of determining the need and selecting the sites. The principal baseline for this has been the Employment Land Review. This has mainly consisted of identifying available land existing employment areas that is considered to be available and deliverable and comparing the total to the requirement identified in the ELR. We have concurred with the separation of employment land in the ELR between general employment land and port and marine land. The total land available for general employment is significantly lower than the identified requirement. We have therefore assessed potential sites of sufficient scale which has meant considering a Green Belt deletion. The Green Belt Review has informed this stage of the site selection work. The allocation of 16.5 hectares at Wardley Colliery is considered to be the most appropriate option.

#### RELATIONSHIP BETWEEN HOUSING AND EMPLOYMENT SITE SELECTION PROCESSES

- 4.20 It is important that the two processes are co-ordinated and they have been run in parallel with each other. As previously detailed, we have had to balance competing demands for a finite supply of land. The Officers leading on the SHLAA have cross-referenced their assessments to the ELR. The Pre-Publication Draft Local Plan proposes the allocation of Ashworth Fraser Industrial Estate for residential development and Cleadon Industrial Estate for residential-led mixed-use development. It is important to protect our employment land portfolio, particularly given the overall deficit of general employment land identified in the ELR. However, we have had to balance this against an assessment of the viability of these two estates for economic development purposes and the need to ensure that we meet our identified housing requirement.

#### RELATIONSHIP TO NEIGHBOURHOOD DEVELOPMENT PLANS

- 4.21 The Whitburn and East Boldon Neighbourhood Forums are in both in the process of producing a Neighbourhood Development Plan for their respective Forum Areas. We have liaised with both Forums and neither is intending to allocate housing or employment sites as part of their respective plan-making processes. The Pre-Publication Draft Local Plan proposes the allocation of housing sites in both Forum Areas. It is anticipated therefore that both Forums will have comments to make in response to the consultation on the Pre-Publication Draft Local Plan.

#### REPORTING PROCESS

- 4.22 The Pre-Publication Draft Local Plan, together with the Sustainability Appraisal, has been reported to the South Tyneside Council Cabinet committee meeting of 7<sup>th</sup> August 2019 and

approval granted for the Local Plan to be the subject of a public consultation from 19<sup>th</sup> August 2019 to 11<sup>th</sup> October 2019. Prior to being reported to Cabinet, it was reported to Senior Management Team and the Strategic Leadership Group. In addition the Strategic Land Review was the subject of Councillor briefings prior to being consulted on and prior to the Final Report being published.

#### NEXT STEPS

- 4.23 The site selection process is ongoing and will take into account the comments received in response to the consultation on the Pre-Publication Draft Local Plan, as well as any additional evidence that is relevant to housing and/or employment site selection, as part of the process of producing the Publication Draft Local Plan.