

| Our Ref | Respondent | Representative | Chapter | Policy | Para/ Criterion | Support /Object | Submitted Comments |
|---------|---------------|---------------------|-------------------------|---------|-----------------|-----------------|--|
| ST02 94 | Mark Goodwill | Statutory Consultee | 06 Economic Development | ED02.09 | | Comment | Hence, we would request the following wording changes in the Local Plan document related to these sites: <ul style="list-style-type: none"> • An introduction of 'Key considerations' wording for employment sites, specifically: <ul style="list-style-type: none"> - For ED2.9 and ED3.3 this should highlight that physical measures are likely to be required in order to mitigate the impacts of development on the strategic road network. |
| ST02 94 | Mark Goodwill | Statutory Consultee | 06 Economic Development | ED03.03 | | Comment | Hence, we would request the following wording changes in the Local Plan document related to these sites: <ul style="list-style-type: none"> • An introduction of 'Key considerations' wording for employment sites, specifically: <ul style="list-style-type: none"> - For ED2.9 and ED3.3 this should highlight that physical measures are likely to be required in order to mitigate the impacts of development on the strategic road network. |
| ST02 94 | Mark Goodwill | Statutory Consultee | 06 Economic Development | ED03.04 | | Comment | Hence, we would request the following wording changes in the Local Plan document related to these sites: <ul style="list-style-type: none"> • An introduction of 'Key considerations' wording for employment sites, specifically: <ul style="list-style-type: none"> - For ED3.4, it should highlight the need for a Transport Assessment which includes reference to assessment of the A19. |
| ST02 94 | Mark Goodwill | Statutory Consultee | 06 Economic Development | ED03.01 | | Comment | We would also comment that although the Port of Tyne benefits from permitted development rights to approve port-related development on land in its ownership, the scale of the area identified as available within the plan period (15.31ha) is such that the traffic impacts on the strategic road network are likely to be significant, and a mechanism for the funding of schemes to mitigate these impacts and any worsening of air quality which impacts upon the Air Quality Management Area around the Lindisfarne junction of the A19, should be considered. |
| ST01 48 | John Blundell | | 06 Planning for Jobs | ED01 | a | object | 4. Inability to evidence or justify job creation. 5. Over ambitious policies on employment, and employment land predicated on an under performing IAMP. NELEP 6. Invalid assumptions on who the Preferred option 7000 houses are for within a context of large out-commuting that has increased, and have houses already. 11. Inappropriate Standard method that uses the housing rate for the 1st 10 years applied to 2nd 10 years as unrealistic assessment of ONS2016 population actual data. 12. All LAs with a significant decreasing age 16-64 has resulted in most LAs using a "Pass the Parcel" "Musical chairs" to attempts to increase internal migration workforce 16-64 and excessive housing requirement to house them. As workforce only move within the |

economic area that results in zero economic growth, and for Workforce only to move to adjacent LAs still within the area. It does nothing to address ag16-64 decline.

20.St employment aspiration is over reliant on an under-performing NELEP SEP and IAMPS. All evidence as contrary to the over ambitious policy aspiration. APS Workplace Employment tend as a disparity of 15,963 with any aspiration for 7000 jobs 2016-2036.

21. Jobs are filled by residents and commuters already with houses. -4000 jobs losses 2016-2019 as a disparity of 15,983 with ambitious jobs creation of 7000. 2016-2036. Evidence is contrary to aspiration.

22.All economics, APS employment, UKHPI house prices, ONS Commuters, GVA, and ONS2016 population projections as real demographic latest data as opposed to out-of-date DCLG2014 evidences no exceptional circumstances to delete Green belt.

3. The inappropriate dependency on unstable Enterprise Zones and single business project e.g. NELEP Strategic Economic Plan SEP and IAMP to evidence excessive housing aspiration, while jobs distribution may or may not necessarily be provided by South Tyneside workforce, and may become widely dispersed throughout the full NE12LA or NECA7LA(4+3) HMA. That does not meet the robust requirement justification. The NELEP has consistently under-performed against England Workplace indices employment creation. Chart Annual Population Workplace Employment. NELEP APS Workplace 5.31% increase as 4.75% less than the England 10.06% 2011-2018. That is similar flawed jobs assumptions in the South Tyneside Local Plan predicated on an under-performing NELEP.

There is no evidence that any North East Local Enterprise Initiatives that started in April 2011, have delivered significant residents jobs increase above the England 9.82% other than Newcastle 13.19% APS Resident employed 2011-2018. Compared to an England jobs increase of 9.82% 2011-2018, most of the other North East Local Authorities are below that England average, below the NELEP 7LAs 6.02% and below the North East 12LAs 5.17% increase. Chart Annual Population Resident Employment.

Historic evidence shows that it is flawed assumption that NE Enterprise zones deliver increased jobs. On the contrary since the NELEP started in April 2011, most NELEPs have continuously underperformed in APS residents jobs 6.02% increase as -3.80% less than England 9.82%, and

The NELEP North East Strategic Economic Plan SEP aspiration for 100,000 jobs by 2024 is actually underperforming with the bench mark of the England APS employment, both as APS Resident employment -3.80% less, and APS Workplace employment -4.75% less than the England employment change 2011-2018.5. Most new jobs go to only 3 LAs 2011-2018.25 and the rest as well below the England new jobs delivery 9.82% and even well below the NELEP 6.02%. The issue is that those jobs are not being achieved (Item 4 Chart),

with -4,000 job losses 2016-2019 for South Tyneside, as historically only filled by existing residents, and reduced commuters 2016-2019. In periods of job creation, few jobs are filled by net-international, or net internal migration. Even in a high job creation period from 9,400 unemployed only 3,100 filled jobs 2013-2016 and increased -2,600 extra commuters as -21000 more out-less in. It is perverse to then have policies that ignore those 9,400 unemployed for 7,000 imported workers, and 7,000 houses for them, while 9,400 unemployed residents with exactly the same skill sets Standard Occupational Classification SOC are ignored, not least already have houses. Average unemployed 7,330 10.47% 2009-2019. Current unemployed 5,500 (Item21 Chart).

4. Unless South Tyneside CC can evidence and justify significant job creation that is not accounted for in the ONS Components of Change projections 2016-2036 (Item14 Chart), then the aspiration for 7,000 houses and 7,000+ jobs is flawed and over ambitious. With 2,100 job gains 2013-2016 and -4,000 job losses 2016-2019, there is no valid or reliable evidence or justification,

5. The Local plan is predicated on over ambitious polices of the NELEP Strategic Economic Plan SEP which is not delivering jobs for South Tyneside. Within the NELEP lep commuters -21,500 2011.75 start of NELEP increased to -31,300 2018.75 net out-commuting as a -9,800 45.58% 2012-2019 increased exodus from the region since the start of the NELEP initiatives. Similar for the North East as -12,400 49.80% exodus 2012-2019. The historical evidence 2011-2019 is that South Tyneside new jobs are filled by residents, and commuters, all with houses already. Similarly job losses as increased unemployment, and more out-less in commuting. All with houses already. ONS2016 already account for 5,092 internal, and 2,050 international migration that become residents the year after, throughout 2016-2036 in their population Components of change using trending for the previous 5 years 2011-2016. Unless that trending is affected by significant economic or political events then the housing for future residents is already accounted for, not least that trending already inclusive of job gains 2013-2016 and greater losses 2016-2019.

6. The Local plan predicates over ambitious polices on the NELEP Strategic Economic Plan SEP. Jobs are mostly filled by residents and commuters, with a NELEP Strategic Economic Plan SEP underperformance compared to England National in not creating jobs. However the South Tyneside CC Local Plan then inappropriately attempts to validate the excessive 7,000 housing 7,000+ jobs aspiration using NELEP SEP as an exception circumstance to delete Green belt when there is no credible evidence to support that position. The North East commuting increased exodus as -12,400 49.80% outflow to other regions 2011.75-2018.75 at a time when the NELEP SEP was supposedly creating job, and persistent historic under-performance job creation all within the NELEP LEP failed jobs creation scheme for most LAs. An England average jobs increase 9.82%, while a NELEP 6.02% (Item 3 Chart b) confirms there is no credibility in the South Tyneside Local Plan

over ambitious employment land aspiration based on unstable jobs delivery and currently as -4,000 jobs losses 2016-2019.

Although DCLG2014 is imposed, the real data is 73.44% more than for demographic need MHCLG2016 4036, as opposed to a Planning Inspectorate average 20% 2010-2016. 73.44% is excessive to the operative DCLG housing requirement at the time as 20% average above demographic need of all approved England Local Plans 2010-2016. (Item11 Chart). Even though DCLG2014 is imposed 5997 (+affordability 7,000), the demographic need is realistically only MHCLG2016 4036 (+affordability 74216).

In any adjudication that requires significant deletion of Greenfield/Belt, it is inappropriate to have an assessment that has created nearly all the Green belt deletion through an out-of-date, superseded, artificial, and excessive arbitrary process using DCLG2014, not least at the expense of Green Belt due to unnecessary and over ambitious Policy ED1,2 194.23ha+29.76ha Employment land, and inadequate SHLAA methodology to provide a fair proportion as Brownfield (Item16 table) achievable SHLAA 67.47% Greenfield to 32.53% Brownfield, and (Item17 Yields table) 62.09% Greenfield to 37.91% Brownfield.

13. No evidence for economic growth intervention with South Tyneside as similar high rank order 88.3% GVA/hour, average 88.0% 2012-2016 compared to other North East LAs 89.4%GVA/hr. England excluding the SE and London is 89.0% GVA/hr. South Tyneside 88.3%GVA/hour requires no regional economic growth intervention or excessive aspiration for employment land with Housing that could have been built on that land to be built on Green Belt instead.

Census2011 Commuters for South Tyneside as out-commuting -14,300 that transfer earning to areas where they work that is redressed using GVA/hr. Also indication that South Tyneside is a dormitory satellite to mostly Sunderland and Newcastle. As Census2011 is becoming outdated more accurate commuter data can be assessed using difference between the APS Workplace and APS resident employment as overall daily movement. The South Tyneside SHMA is also outdated using data only up to 2013-15. (Item4 Chart Workplace-Resident -21000 2016 more out, less in).

14. An over ambitious 7,000 housing aspiration(also as DCLG2014+StdMthd) reliant on unjustified imported employment land/workforce that would need 2,964 73.44% more houses than CLG2016 4,036 demographic need, and 2,784 66.05% more houses than CLG2016 Standard method 4,216. Contrary to 4000 lost jobs 2016-2019, an over ambitious employment creation dependent on an under-performing NELEP, IAMP that then causes excessive aspiration for employment land in Policy ED1,2 194.23ha and 29.76ha which in turn forces housing to use Green belt. Employment land at 200ha at 40units/ha delivers 8000 houses or even 1/3 of that could have negated all of the intended deletion of Greenfield/Belt 2,644 Item30 list. Demographic need for houses is MHCLG2016 4,036 or DCLG2014 5,997, the rest of the 7,000 has to be for 7,000 undeliverable jobs for imported

workers, while all new jobs proven to be filled by residents and commuters with homes already. Any imported workforce that become residents the year after is already accounted for within the ONS2016 Components of change 5,092 net Internal migration, 2,050 net International migration, with 7,000 workers extra homes as double counted housing already part of DCLG2016, and identified by a previous 5 years trending, inclusive of any business ventures and NELEP SEP initiatives during 2011-2018. Those enterprise schemes since 2014 have occurred without any housing intervention or extra employment land.

20. South Tyneside employment aspiration is over reliant on the NELEP SEP, aswell as IAMP and contrary to the actual ONS Annual Population Survey employment data.(Item3 Charts). From 2016-2019 there has been a significant 4,000 job losses (Item4 Chart). That is no evidence to have over ambitious aspiration for employment land.

The Workplace Employed Annual Population Survey APS indicates the 7,000 jobs aspiration cannot be justified using volatile employment history with a disparity of 15,983 less than suggested by the APS trendline 2008-2018 for projected period 2016-2036. Using land for unnecessary employment redirects housing requirement to have to use Greenfield/Belt, and also excessive disproportionate achievable 67.47% of Greenfield with only 32.53% as Brownfield. (Item16 table) Job Aspiration that uses NELEP Strategic Economic plan SEP and IAMP 7,850 jobs is double counting as most other adjacent LAs also put claim to the same jobs. NELEP SEP has under-performed in delivering jobs compared to UK jobs creation or a Brexit compromised IAMP (Item3 Charts under-performing NELEP Strategic Economic Plan SEP 2011-2019)

21. South Tyneside unemployment average is 7,330 10.47% 2009-2019 as 3.7% above England average 6.5%. That does not evidence any reliable jobs creation for resident employment.

Current unemployment is increasing as also indicative of an over ambitious aspiration for employment land and presumably to import workforce from elsewhere ignoring the current resident 5,500 unemployed (7.9%) 2019, who already have houses and the same skill sets. Item 3 SOC table. South Tyneside Local Plan policies ignore their own average unemployed 7,330 10.47% 2009-2019 or current 5,500 unemployed residents for 7,000 houses presumably for unnecessary imported workforce.

22. Excessive housing for imported workforce is historically not required as residents fill the jobs. Not least workplace employment confirms the disparity with significant job losses -4000 2016-2019. (Item 4 Chart APS 2013-2019) as inappropriate to then make unrealistic extrapolation and policy assumptions. An APS Workplace 15,983 large disparity between trending 2008-2018 (item20 Chart), and aspiration is indication of an unrealistic jobs aspiration and over ambitious employment land that causes unnecessary Green bell deletion.

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| | | | | | | <p>24. There is no evidence for economic necessity to delete Green belt, exacerbated by the fact that in a period of increased employment those extra jobs were filled by residents and commuters already with houses, or already included in the ONS Components of Change allocation for Population and Housing. South Tyneside CC aspiration for imported workforce “Policy-On” is flawed as jobs are filled by residents already accounted for in ONS trending 2,050 net international migration, and 5,092 net internal migration. 7,000 jobs as particularly imported workers is not realistic. A jobs volatility capable of -4,000 job losses 2016-2019, equally as a 2,100 jobs increase 2013-2016 (Item4 chart) does not evidence any realistic jobs creation.</p> <p>26. CLG2016 Housing projections are 4,036 houses 2016-2036. (DCLG2014 5,997). It is inappropriate to have over-ambitious aspiration for 7,000 houses, 7,000+jobs, and excessive employment land retained or proposed that causes house to have to use Greenfield/Belt to then state it has a shortfall, to then delete high value Greenfield/Green Belt. That does not evidence or justify identifying areas as being Housing growth Areas or Employment Land, which are high value Greenfield/Green belt. Those high value Greenfield/belt areas are required to maintain their high value status to avoid urban sprawl. There is no sound or robust evidence to justify employment land or housing on those areas using MHCLG2016 or DCLG2014 housing projections, with reasonable additions for affordability, and realistic economic aspiration. There is no evidence of any stringent economic necessity for exceptional circumstances to remove high value Greenfield/Green belt land.</p> |
| ST03 10 | Helen Marks | Planning Consultant | 06 Planning for Jobs | ED01 | Comme nt | <p>Port of Tyne / Policy ED1</p> <p>Policy ED1, ‘Strategic Economic Development’, puts a strong emphasis on supporting development that make a contribution to building a stronger and more resilient local economy. The Port welcomes the recognition within this policy and wider supporting text, that the Port of Tyne is a crucial business within South Tyneside and endorse the inclusion of criterion (b) which specifically relates to the Port.</p> <p>ED1 criterion b (iii) states that “Logistics are important for regional, national and international connections and a key business partner in this sector is the Port of Tyne and we will continue to recognise and support the role of the Port of Tyne as a key economic asset for the Borough and the region.”</p> <p>However, ‘logistics’ is not an all-inclusive representation of the Ports operations, and does not go far enough in recognising the five core stands of the business; car exports, conventional and bulk cargo, cruise/ferry, estates and logistics which together encompass services offered by the Port within the oil and gas and energy sectors. Likewise, whilst the support for the Ports operations at paragraph 6.11 is welcomed, the text is not comprehensive in its acknowledgement of the Port’s operations. In particular, there is no reference to the estate’s operation or bulk and project cargoes and also does not</p> |

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| | | | | | | | <p>acknowledge that the Port of Tyne benefits from Permitted Development rights. Therefore, we would advocate that in addition to our Policy recommendations, the supportive text be redrafted to include other existing sectors (as stated) and reference that the Port's estate benefits from Permitted Development rights. Suggested wording for criteria b) of Policy ED1, would be;</p> |
| ST03 10 | Helen Marks | Planning Consultant | 06 Planning for Jobs | ED01 | | Comme nt | <p>'b) Port of Tyne iii 'The activities of the Port of Tyne, including port services, are important for regional, national and international connections and the Ports contribution to the economy of the Borough in delivering this is recognised in this and supported.' Associated paragraph 6.11 could be reordered to give greater acknowledgement to other Port services; 'The Port of Tyne is a key economic asset for the Borough through the delivery of Port services including bulk and project cargoes, automotive industry cargoes and its estates role. As a result, the Port of Tyne is a key business partner in the logistic sector for regional, national and international connections...' Criterion C (iv) of Policy ED1 goes on to support offshore energy within the river corridor. The Port of Tyne is actively trying to expand into this sector, in accordance with the government aims and national planning policy. To facilitate this, the Council have stated "...will protect suitable employment sites in the riverside corridor for employment uses which benefit from riverside access", and sites that benefit from river access are identified on the policies map as 'Land for Port and Marine Uses' (Policy ED3). Although Policy ED3 is discussed in more detail below, it is important to highlight at this point that all employment policies within the STLPPPD should be coherent in their implementation. Given that Policy ED1 has specifically referred to offshore energy and subsea technology with regards to the 'River Corridor', we would recommend that this is clearly stated within the associated relevant policies, including ED3. Provision of Specialist Employment Land / Policy ED3 The Employment Land Review 2019 (ELR) states that over the past 15-years the Port of Tyne has been solely responsible for 40% of the uptake of employment land across the Borough (page 3). Given the strength of this activity at the Port the ELR recommends that a specific Port/River Related Land Requirement and this is reflected in STLPPPD Policy ED3. The Port of Tyne land is referenced ED3.1 and is subdivided into Allocated Land (141.3 hectares) and Available Area (15.31 hectares).</p> |

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| | | | | | | <p>The sites identified as 'Available Area' for the purposes of ED3.1 are understood to correspond with those identified at Appendix 3 of the ELR and includes E19' Tyne Dock Enterprise Park (former McNulty Offshore), Commercial Road. For this reason, the sites inclusion as a General Employment Area on the Key Diagram is inconsistent as previously highlighted. Furthermore, this contradicts the sites allocation the Proposals map at 'Land for Port and Marine Uses'.</p> <p>Three other sites are also identified within the Tyne Dock Estate as 'Land for Port and Marine Uses' under Policy ED3.1 suggests that the land identified within the Port's estate is available, however this doesn't reflect the high uptake of land at the Port, as identified in the ELR. Since the time of preparing the STLPPD the circumstances have changed, and several are no longer available. Given the changing dynamics of the Port, we would suggest that land within the Tyne Dock Estate not be exclusively identified unless specifically indicated by the landowner, this reduces the risk of it being immediately 'out of date' and identifying sites that are not deliverable. Therefore, we suggest that the Available Area for the Port of Tyne is reduced to 7,1 hectares to reflect the available land at the former McNulty's Yard only.</p> <p>With regards to wording of Policy ED3 this is somewhat inconsistent with provisions of Strategic Policy</p> <p>ED1 as previously stated, there is a clear focus on supporting "specialist uses such as heavy processing industries and port logistics...", and other uses that require port or riverside access reference is not included to offshore technology and the subsea sector. In addition, we believe the current wording of the policy to be confusing and should be amended as follows;</p> <p>Policy ED3: 'As shown on the Policies Map, where planning permission is required specialist uses such as heavy processing industries, port services, offshore technology and the subsea sector will be supported within the uses specified within the table. other suitable employment related sui-generis uses that require port or direct riverside access, will also be supported'</p> <p>The Port of Tyne, benefits form Permitted Development rights, as recognised in paragraph 6.22. This should be further expanded on within the paragraph, to make specific reference to the General Permitted Development Order.</p> <p>Proposals Map</p> <p>The comments above cover the key issues raised by the Port with regards to its land as allocated within the Proposals Map.</p> <p>Additionally, however, it should be noted that the Key reference to 'Land for Port and Marine Uses' does not in fact include reference to Policy ED3.</p> |
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| ST03 31 | Lucy Bartley | Planning Consultant | 06 Planning for Jobs | ED03. 01 | | Comme nt | <p>South Tyneside Council: Local Plan Pre-Publication Draft Local Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf.</p> <p>We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>Proposed sites crossed or in close proximity to National Grid infrastructure: Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf.</p> <p>Electricity Transmission: Please see enclosed plan referenced ET380 & ET381 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> <p>Electricity Distribution Northern Powergrid owns and operates the local electricity distribution network in South Tyneside Council. Contact details can be found at www.energynetworks.org.uk.</p> <p>National Grid Asset Guidance National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.</p> |
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National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area.

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by your works, please contact National Grid's Plant Protection team via plantprotection@nationalgrid.com or visit the website: <https://www.linesearchbeforeudig.co.uk/>

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines: <https://www.nationalgridet.com/document/130626/download>
 - Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
 - Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network-andassets/working-near-our-assets>
- Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.
- Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid

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| | | | | | | | <p>Transmission assets outlined above.</p> <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p> |
| ST03 31 | Lucy Bartley | Planning Consultant | 06 Planning for Jobs | ED02. 08 | | Comme nt | <p>South Tyneside Council: Local Plan Pre-Publication Draft Local Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf.</p> <p>We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>Proposed sites crossed or in close proximity to National Grid infrastructure:</p> <p>Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf.</p> <p>Electricity Transmission:</p> <p>Please see enclosed plan referenced ET380 & ET381 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf</p> <p>Electricity Distribution</p> <p>Northern Powergrid owns and operates the local electricity distribution network in South Tyneside Council. Contact details can be found at www.energynetworks.org.uk.</p> <p>National Grid Asset Guidance</p> <p>National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines</p> |

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- Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/workingnear-our-assets>
- Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network->

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| | | | | | | | <p>andassets/ working-near-our-assets Appendices - National Grid Assets Please find attached in:</p> <ul style="list-style-type: none"> • Appendix 1 provides a map of the National Grid network across the UK. • Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid <p>Transmission assets outlined above. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p> |
| ST19 30 | Gary Baker | Planning Policy Team Leader, Sunderland City Council | 06 Planning for jobs | ED01 | | Support | <p>Planning for Jobs SCC are generally supportive of the Plan's commitment to economic growth which seeks to maintain a portfolio of 194.23 ha of land for general economic development needs and a further 250.17 hectares of land maintained for specialist port and marine development, as set out in Policy ED1. SCC also supports and welcomes the Plan's commitment to the delivery of the IAMP.</p> <p>It is encouraging therefore to see the IAMP features within the vision and Policy ED1 Strategic Economic Development. SCC will continue to work closely with South Tyneside Council in supporting the delivery of the IAMP.</p> |
| ST19 35 | Rachael Milne | South Tyneside Tree Action Group | 06 Planning for jobs | ED03. 2 | | Objecti on | <p>3.7 Table 3.1 Objective 8 states 'The sustainability question was deleted as new office accommodation in Town Centres is no longer a specific aspiration of the Employment Land Review updated (2018)</p> <ul style="list-style-type: none"> • ED 3.1 (please note 6 sites have this code. One of the sites near the river Don that is joined onto Nissan car storage yard at the Port of Tyne is not suitable for ant kind of development as it is a heavily forested piece of land and we oppose this development) <p>The 5 ED 3.1 economic development areas along the river bank should be reassessed to see if they are suitable for house building.</p> <ul style="list-style-type: none"> • ED3.2 • ED3.3 • ED3.6 <p>THESE SIGHTS ARE ALL ALONG THE River bank. 2 of them are near the pedestrian tunnel and would be good for housing? Please scrutinise these areas for housing instead of economic development.</p> |
| ST19 35 | Rachael Milne | South Tyneside | 06 Planning for jobs | ED03. 3 | | Objecti on | <p>3.7 Table 3.1 Objective 8 states 'The sustainability question was deleted as new office accommodation in Town Centres is no longer a specific aspiration of the Employment Land Review updated (2018)</p> |

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| | | Tree Action Group | | | | | <ul style="list-style-type: none"> • ED 3.1 (please note 6 sites have this code. One of the sites near the river Don that is joined onto Nissan car storage yard at the Port of Tyne is not suitable for any kind of development as it is a heavily forested piece of land and we oppose this development) The 5 ED 3.1 economic development areas along the river bank should be reassessed to see if they are suitable for house building. • ED3.2 • ED3.3 • ED3.6 <p>THESE SIGHTS ARE ALL ALONG THE River bank. 2 of them are near the pedestrian tunnel and would be good for housing? Please scrutinise these areas for housing instead of economic development.</p> |
| ST19 35 | Rachael Milne | South Tyneside Tree Action Group | 06 Planning for jobs | ED03.6 | | Objection | <p>3.7 Table 3.1 Objective 8 states ‘The sustainability question was deleted as new office accommodation in Town Centres is no longer a specific aspiration of the Employment Land Review updated (2018)</p> <ul style="list-style-type: none"> • ED 3.1 (please note 6 sites have this code. One of the sites near the river Don that is joined onto Nissan car storage yard at the Port of Tyne is not suitable for any kind of development as it is a heavily forested piece of land and we oppose this development) The 5 ED 3.1 economic development areas along the river bank should be reassessed to see if they are suitable for house building. • ED3.2 • ED3.3 • ED3.6 <p>THESE SIGHTS ARE ALL ALONG THE River bank. 2 of them are near the pedestrian tunnel and would be good for housing? Please scrutinise these areas for housing instead of economic development.</p> |
| ST19 37 | Helen Marks | YoungsRPS | 06 Planning for Jobs | ED02 | | Objection | <p>Dear Sirs, South Tyneside Local Plan – Pre-Publication Draft Plan Consultation These representations are submitted on behalf of Harworth Estates Investments Limited (‘Harworth’), to South Tyneside Council (the ‘Council’) in response to the consultation on the South Tyneside Local Plan – Pre-Publication Draft Plan (STLPPD). The Soundness of the Plan Paragraph 35 of the National Planning Policy Framework (NPPF) states that Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> |

- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework

Our client does not consider the STLPPPD to be sound on the basis that whilst the Council has taken a generally positive approach to economic development and addressing key employment issues that relate to the Boroughs employment land requirements, it has not included sufficient flexibility to respond to demands for alternative uses on the strategic employment site at Wardley or to respond to market drivers. Policy ED2.1, associated Policy ED2 and associated text should make provision for a larger employment allocation at Wardley, in order to support the longevity and prosperity of South Tyneside, doing so would be consistent with the overarching objectives of the NPPF.

Vision

The overall vision and objectives of the plan are endorsed by Harworth, specifically in terms of support for the wider portfolio of employment sites to provide active and productive locations for continued investment. This includes bringing brownfield sites, such as Wardley into active use. However, the current drafting of Policy ED2.1, and Policy ED2, undermines the overall approach to which the Council has committed at the outset of the draft Plan.

Spatial Strategy / Policy S1

Spatial Policy S1 states that land for new employment development will;
 ‘Be provided for on the new allocation at Wardley which is attractive to the market with good access to the strategic road network, Port of Tyne and the potential reopening of the Leamside Line.’

The reference to Wardley at Strategic Policy S1 is welcomed and with reference to its accessibility to both the strategic highways network and the Leamside Line. It should also be highlighted that the existing rail connection at the site can currently be utilised and therefore is not dependant on the reopening of the wider Leamside Line.

However, despite clearly acknowledging the locational advantage of the site, the proceeding detailed text at Policy ED2.1 currently limits the economic development area at the site to 16.5 hectares and this is reflected elsewhere in the document, including policy ED2. It is our understanding that this area represents the previously developed aspect of the site including areas that benefit from existing consent for economic development, which somewhat explains its illogical shape. The remaining 38 hectares, as calculated in the draft plan, is identified as a Local Wildlife Site (LWS). The accompanying

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| | | | | | | <p>proposals map also shows the site as being bisected by a wildlife corridor which is identified in policies NE1 and NE2.</p> <p>The current approach to limit the extent of the economic development area at Wardley as referenced in policy ED2 and ED2.1, is in our view inconsistent with national guidance when taking into account the sites extensive history, the Borough's employment land position and the vision of the local authority.</p> <p>The updated Employment Land Review 2019 (ELR), prepared for the Borough by Lichfield's in conjunction with Lambert Smith Hampton, recently identifies high recent general employment demand, as evidenced by employment land take up for the western side of the Borough. To date this has principally been due to the area's connectivity, and particularly the area around Boldon and Monkton which extends to include our Client's site at Wardley. In due course, IAMP is expected to further contribute to future demand in this area.</p> <p>In summary, Harworth Estates supports the provisions of Spatial Policy S1, but does not consider this to translate to the relevant detailed policies (ED2 and ED2.1) which unnecessarily restrict the economic development area at Wardley, in advance of having thoroughly considered the full extent of the potential developable area.</p> |
| ST19 37 | Helen Marks | YoungsRPS | 06 Planning for Jobs | ED02. 1 | Objecti on | <p>Harworth is one of the leading land and property regeneration companies across the North of England and the Midlands, owning and managing c. 21,000 acres on 136 sites. The Company's priority is to bring life to former industrial sites and return derelict land into active use, by way of the delivery of employment areas and new homes. In this context, Harworth is fully committed to securing the regeneration of the former Wardley Disposal Point at Follingsby (the 'Site'), for employment use, realising its full potential contribution in this regard.</p> <p>Acquired by Harworth in 1995, Wardley is a rail-connected former coal processing and disposal site that was operational in the early 1990's. Since that time it has been occupied by several uses, including; permanent container storage and the temporary storage of material from the Tyne Tunnel construction works. In 2015, Harworth demolished the redundant coal plant and planning permission was secured on the southern part of the site for an anaerobic digestion plant, in June 2013, which will in due course supply gas to the grid when the development is completed. More recently the site has been used to store materials from local infrastructure improvement works at Testos roundabout. The areas of land utilised for these activities equates to the 16.5 hectares which are currently identified for economic development in draft Policy ED2.1.</p> <p>In addition to the rail connection, the site benefits from being close to the A194 (M) which is linked directly to the A1 (M) as well as Newcastle Airport, the Tyne Tunnel and the Port of Tyne, and also Sunderland. The businesses based on the adjacent logistics park already enjoy the benefits of this great location. Wardley is also next to the North East's proposed</p> |

International Advanced Manufacturing Park (IAMP), which will provide expansion land for businesses serving Nissan, work on which has now commenced, and is directly north of Follingsby II. In short, the site is ideally positioned close to several strategic employment sites south of the Tyne, as acknowledged in the STLPPD and the supporting evidence based as detailed later in this letter. It is within this context that Harworth is submitting these representations to the STLPPD.

Whilst Harworth did in the consultation in advance of the release of the draft plan, and supports the Council's overall vision for the Borough, it does not support the approach with regards to its land interests at Wardley as encapsulated in draft Policy ED2.1.

Harworth considers that the limitations imposed by draft Policy ED2.1 (and associated policy ED2 and supporting text) is a significant missed opportunity to meet the general employment needs of the Borough during the plan period, and also to capitalise on the opportunities presented by the Wardley site in terms of the economic contribution it could make to South Tyneside.

Whilst the ELR presents the evidence base to support the identification of land within the Borough for general employment uses, the current allocation at Wardley does not provide the flexibility to deliver this or to respond to changes in the market demand, principally due to the tightly constrained boundaries of the land proposed to be removed from the Green Belt. As previously stated, this boundary simply reflects consented development within the site, which explains its somewhat illogical shape. It should be noted that this includes land take for the anaerobic digestion plant, which is yet to be deducted from the available land area. This is further exacerbated by the fact that the available land figure also includes the new proposed railway station, in connection with the reopening of the Leamside Line, as supported by draft Policy IN7. This proposal is currently being progressed by Nexus and involves direct correspondence with our client. Whilst the provision of a new station and car park at the site is supported by Harworth, given the sites highly accessible location and proximity to IAMP, this should not be at the expense of the new land for general employment use in this location, as clearly identified within the ELR.

As set out at paragraph 6.6 of the STLPPD the methodology for the calculation of the extent of land needed for economic development in the Borough makes allowance for the potential impact of IAMP. This is the 'Policy- On Labour demand' scenario as presented in the ELR and has been calculated to generate a General Employment Land requirement of 30.76 hectares overall, which results in an under provision of 17.5 hectares. The majority of this shortfall (16.5ha) will be delivered by Harworth at Wardley. To limit the developable area at Wardley to 16.5 hectares when considering its significant and strategic contribution to employment land in the Borough during the plan period, and

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| | | | | | | <p>particularly given its relationship to IAMP on which the methodology is based, seems unduly restrictive.</p> <p>The NPPF advises local authorities to provide flexibly to accommodate needs not anticipated during the plan period, to help facilitate economic growth and ‘...to enable a rapid response to changes in economic circumstances (paragraph 81). The Framework also highlights that planning policies need to reflect changes in demand for land which could include specific occupier requirements, which is particularly relevant given recent market interest in the site. The NPPF suggests plan makers should consider market intelligence and market signals. In this instance, this should be the advice provided by Harworth with regards to active interests in the site which is currently being marketed by HTA and LSH. Occupier interest in the site, following a marketing exercise, has resulted in an offer for the entire area. Although the land take for this operator in terms of developable area may be similar to that currently allocated within the draft policy, the configuration of this space in particular may be somewhat different. Equally, the requirements of an alternative strategic operator may be greater and there are limited opportunities to accommodate additional general employment use requirements elsewhere in the Borough, and particularly in this area around Follingsby and Monkton, identified as an area of demand for employment land (paragraph 6.1 of the Draft Plan). This conclusion is well supported in the ELR, which identifies limited availability of sites in this area and where there is a strong demand, evidenced in part by low vacancy rates and past take up rates (paragraphs 5.8, 5.15, 5.17, 5.41, 5.45, 5.48 and 6.70). The recommendation the ELR prepared for Gateshead Council in 2012, was that the authority assesses the feasibility of bringing forward additional employment land to the south of the Follingsby Primary Employment Area (paragraph 10.86 Gateshead ELR) and its subsequent allocation as an Enterprise Zone within the Local Plan supports this position.</p> <p>As previously noted, any future railway station and associated parking area for Leamside Lane must also be accommodated in excess of any employment land allocations, however the current quantum of General Employment land does not consider this. Furthermore, this is in advance of taking into account the land take for the anaerobic digestion facility that has been approved and is expected to be implemented. As such, the current policy does not provide enough flexibility within the context of the advice provided within the national planning policy context and more generally presents something of an overlooked opportunity. Whilst the ELR finds that there is a case for ‘some reshaping of the portfolio of employment land through deallocating of sites which are unlikely to be taken-up within the Plan period whilst identifying new sites for allocation that will be more attractive to the market.’(paragraph 6.36), the restriction on the economic development area at Wardley to 16.5 hectares does not adequately satisfy this recommendation.</p> <p>Policy ED2 Provision of Land for General Economic Development (Strategic Policy)</p> |
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| | | | | | | <p>Policy ED2.1 Wardley Colliery (Strategic Policy)</p> <p>Strategic policy ED2.1 currently makes provision for 16.5 hectares of the 54.5 hectares at Wardley to be brought forward for economic development, which has been supported by a strategy to protect, enhance and manage the Wardley Colliery Local Wildlife Site ‘together with a delivery programme regarding the timing, funding and implementation of any necessary actions arising from that strategy’ (criteria B). The policy also requires ‘... any adverse ecological impacts are dealt with through the mitigation hierarchy, and compensation measures and measurable net gain ... delivered within the Wardley Colliery Wildlife site’ (criteria C) in accordance with draft policy NE2.</p> <p>Acknowledging that the policy already expects that there will be a strategy prepared for the site, it seems logical to incorporate flexibly within the policy as to how much of the site can be brought forward for economic development, and the associated mitigation strategy, subject to demonstrating that this is acceptable in ecological terms. This would allow discussions to continue regarding the extent of the developable area, supported by the relevant survey work and associated compensation strategy. This approach is already recognised in policy NE2, whereby Local Wildlife Sites would be safeguarded against any adverse development in the future.</p> <p>Work undertaken by E3 on behalf of Harworth has already begun to consider the overall potential developable area at Wardley Colliery in the context of the new NPPF, which is clear on the desirability of conserving and enhancing nature conservation and on development plans securing measurable gains. The guidance is now reflected in draft Policy NE1 and specifically criteria (B). Strategic Policy ED2.1 currently takes this one step further requiring compensation and measurable net gain to be delivered at the Wardley site, which seems unnecessary and unduly restrictive at this stage given that the detailed ecological survey work has not yet been carried out and the spirit of the guidance in the NPPF.</p> <p>The initial work undertaken by specialist ecologist consultants, E3 Ecology, to date acknowledge that it is not possible to carry out clear large-scale zoning of the entire site to identify areas that should be protected and less valuable areas suitable for development, given the habitat mosaic of the site and the benefits of different habitats to different species. However, it is considered that a larger area than what is currently identified for economic development (16.5ha) could realistically be brought forward with the appropriate management, mitigation and compensation measures. E3 has suggested that the precise balance and locations could be agreed in response to further detailed ecological survey work and an accompanying phasing strategy. As part of this more detailed work, off site compensation could also be considered, if necessary, to meet the requirements of local and national planning policy, whilst also allowing an appropriate and necessary degree of flexibility in the development options.</p> |
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| | | | | | | <p>In short, the restriction of the economic development area of the site to 16.5 hectares, which effectively reflects existing consented development, prematurely compromises the potential of the site to contribute to the wider economic development strategy of the Borough, as clearly set out elsewhere in the plan and the ability of the Borough to deliver a sustainable travel strategy, with regards the Leamside Line.</p> <p>The criteria already set out within the draft Policy ED2.1, specifically B and C, already protect the wider site from development that would have a significant adverse impact on conserving and enhancing the nature conservation value of land within Wardley Colliery, and as such sets the parameters for the consideration of any proposals that come forward for economic development within the wider site. Albeit we request that Criteria C be amended so that it does not restrict off site compensation. Furthermore, the criteria are reinforced by draft Policy's NE1, NE2 and the NPPF, which would be a suitable starting point of the consideration of any such proposals.</p> <p>It is acknowledged that any economic development proposals for a larger development footprint than that already approved by the historic consents and the established uses of the site, would have to be brought forward as part of a comprehensive proposal for the wider site, to primarily ensure that the nature conservation impact could be appropriately assessed. This is most likely to be in the form of an outline application for the whole site. This can, however, be easily acknowledged within the policy and supporting text. Proposals within the 16.5 hectares can be considered on their own merits in the interim, as has been the approach with regards to any proposals that have come forward to date, including the anaerobic digestion plant and need not be bound by the requirements of the Policy.</p> <p>Dear Sirs, South Tyneside Local Plan – Pre-Publication Draft Plan Consultation</p> <p>These representations are submitted on behalf of Harworth Estates Investments Limited ('Harworth'), to South Tyneside Council (the 'Council') in response to the consultation on the South Tyneside Local Plan – Pre-Publication Draft Plan (STLPPPD).</p> <p>Harworth is one of the leading land and property regeneration companies across the North of England and the Midlands, owning and managing c. 21,000 acres on 136 sites. The Company's priority is to bring life to former industrial sites and return derelict land into active use, by way of the delivery of employment areas and new homes. In this context, Harworth is fully committed to securing the regeneration of the former Wardley Disposal Point at Follingsby (the 'Site'), for employment use, realising its full potential contribution in this regard.</p> <p>Acquired by Harworth in 1995, Wardley is a rail-connected former coal processing and disposal site that was operational in the early 1990's. Since that time it has been occupied by several uses, including; permanent container storage and the temporary storage of material from the Tyne Tunnel construction works. In 2015, Harworth demolished the</p> |
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redundant coal plant and planning permission was secured on the southern part of the site for an anaerobic digestion plant, in June 2013, which will in due course supply gas to the grid when the development is completed. More recently the site has been used to store materials from local infrastructure improvement works at Testos roundabout. The areas of land utilised for these activities equates to the 16.5 hectares which are currently identified for economic development in draft Policy ED2.1.

In addition to the rail connection, the site benefits from being close to the A194 (M) which is linked directly to the A1 (M) as well as Newcastle Airport, the Tyne Tunnel and the Port of Tyne, and also Sunderland. The businesses based on the adjacent logistics park already enjoy the benefits of this great location. Wardley is also next to the North East's proposed International Advanced Manufacturing Park (IAMP), which will provide expansion land for businesses serving Nissan, work on which has now commenced, and is directly north of Follingsby II. In short, the site is ideally positioned close to several strategic employment sites south of the Tyne, as acknowledged in the STLPPDP and the supporting evidence based as detailed later in this letter. It is within this context that Harworth is submitting these representations to the STLPPDP.

Whilst Harworth did in the consultation in advance of the release of the draft plan, and supports the Council's overall vision for the Borough, it does not support the approach with regards to its land interests at Wardley as encapsulated in draft Policy ED2.1.

Harworth considers that the limitations imposed by draft Policy ED2.1 (and associated policy ED2 and supporting text) is a significant missed opportunity to meet the general employment needs of the Borough during the plan period, and also to capitalise on the opportunities presented by the Wardley site in terms of the economic contribution it could make to South Tyneside.

The Soundness of the Plan

Paragraph 35 of the National Planning Policy Framework (NPPF) states that Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

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| | | | | | | <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework</p> <p>Our client does not consider the STLPPPD to be sound on the basis that whilst the Council has taken a generally positive approach to economic development and addressing key employment issues that relate to the Boroughs employment land requirements, it has not included sufficient flexibility to respond to demands for alternative uses on the strategic employment site at Wardley or to respond to market drivers. Policy ED2.1, associated Policy ED2 and associated text should make provision for a larger employment allocation at Wardley, in order to support the longevity and prosperity of South Tyneside, doing so would be consistent with the overarching objectives of the NPPF.</p> <p>Occupier interest in the site, following a marketing exercise, has resulted in an offer for the entire area. Although the land take for this operator in terms of developable area may be similar to that currently allocated within the draft policy, the configuration of this space in particular may be somewhat different. Equally, the requirements of an alternative strategic operator may be greater and there are limited opportunities to accommodate additional general employment use requirements elsewhere in the Borough, and particularly in this area around Follingsby and Monkton, identified as an area of demand for employment land (paragraph 6.1 of the Draft Plan). This conclusion is well supported in the ELR, which identifies limited availability of sites in this area and where there is a strong demand, evidenced in part by low vacancy rates and past take up rates (paragraphs 5.8, 5.15, 5.17, 5.41, 5.45, 5.48 and 6.70). The recommendation the ELR prepared for Gateshead Council in 2012, was that the authority assesses the feasibility of bringing forward additional employment land to the south of the Follingsby Primary Employment Area (paragraph 10.86 Gateshead ELR) and its subsequent allocation as an Enterprise Zone within the Local Plan supports this position.</p> <p>As previously noted, any future railway station and associated parking area for Leamside Lane must also be accommodated in excess of any employment land allocations, however the current quantum of General Employment land does not consider this. Furthermore, this is in advance of taking into account the land take for the anaerobic digestion facility that has been approved and is expected to be implemented. As such, the current policy does not provide enough flexibility within the context of the advice provided within the national planning policy context and more generally presents something of an overlooked opportunity. Whilst the ELR finds that there is a case for ‘some reshaping of the portfolio of employment land through deallocating of sites which are unlikely to be taken-up within the Plan period whilst identifying new sites for allocation that will be more attractive to the market.’(paragraph 6.36), the restriction on the economic development area at Wardley to 16.5 hectares does not adequately satisfy this recommendation.</p> |
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| | | | | | | <p>Whilst the removal of additional land from the Green Belt must obviously be justified in the context of national planning policy, the Council's Green Belt Review (2019) in support of the STLPPPD finds; 'It is clear that in relation to meeting the development needs for new homes and jobs, that exceptional circumstances exist which justify the release of land from the current extent of the Green Belt' (paragraph 6.1). This conclusion is supported by paragraph 6.4 which states 'There are clear opportunities to minimise the harm at a site specific level through the careful selection of sites together with the appropriate mitigation measures such as appropriate densities, the provision of open space at the edge of settlements and use of landscaping and buffers.' . When considering the total area of Harworth's land at Wardley (54.5 hectares), this finding is directly relevant. Harworth disagrees with the findings of the Green Belt Review with regards to the wider Wardley Colliery (Appendix 3), in particular that the western unallocated area performs relatively strongly when assessed against the purposes of the Green Belt, and that loss would have an adverse impact (site FG22c). This finding seems to be based principally on the sites LWS status rather than any visual impact of development given that the report concludes that;</p> <p>'The parcel is screened to the north and east by mature vegetation, and land buffers to the south, and development along its eastern boundary. The neighbouring authority of Gateshead is extending the adjacent industrial estate. The scale of outward growth could therefore be regulated as a result of these established durable features, thus restricting sprawl and preventing further encroachment.'</p> <p>The area to the east which is identified for economic development (FG22d) is considered to make a limited contribution to the openness of the Green Belt, with the removal of the parcel considered to have moderate impact. This land also falls within the Green Infrastructure Corridor and also the LWS, of which the Review concludes that this can be mitigated by following the mitigation hierarchy. We consider that the same principles should be applied to the wider site, and this is addressed in more detail below. Consideration is given to the wildlife designation of the site and its associated value. In summary, Harworth Estates supports the provisions of Spatial Policy S1, but do not consider that this translates to the relevant detailed policies (ED2 and ED2.1) which unnecessarily restrict the economic development area at Wardley, in advance of having thoroughly considered the full extent of the potentially developable area.</p> |
| ST20 72 | Mr Andrew Mills | 06 Planning for Jobs | ED01 | | Objecti on | <p>I would like to see more details supporting economic growth. We are transitioning through major change/challenge decarbonising/digitalising. What are the Borough's plans to future proof our region for environmental and technological targets and advancement? -Growth in jobs/business has to be linked to location/type/volume of new housing.</p> |

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| ST21 70 | Natasha Rowland | National Trust | 06 Planning for Jobs | ED01 | h ix | support | NT supports the recognition in Policy ED1 criterion h ix) to support the realisation of the potential for the visitor economy in the District and that this should be compatible with the natural environment. |
| ST21 70 | Natasha Rowland | National Trust | 06 Planning for Jobs | ED06 | | support | NT strongly supports proposals that maximise the use of existing developed sites within the Foreshore Area, where there are opportunities for regeneration and improvements to provide new opportunities for the residents of South Tyneside. This is reinforced through the regeneration policies of the plan and we specifically lend our support to policy RG6 Foreshore Improvement Area which identifies a need for Public realm improvements and development of sporting leisure facilities at Gypsies Green, (as defined on the Policies Map); There are significant opportunities that could be realised here for the health and well- being of residents in South Tyneside. |
| ST22 08 | Cllr Ellison Cllr Porthouse Cllr McHugh | South Tyneside Council | 06 Planning for jobs | ED3.0 6 | | Objecti on | We understand however the need to meet national requirements for residential dwellings within the local authority area. Therefore, we would like to make a formal proposal that full consideration is given to the alternative site of Hawthorne Leslie, Ellison Street, Hebburn. The Hawthorne Leslie site is a vast site, currently identified for industrial purposes, with a significant history of fires and injury upon its current structure. We believe that this site, now within a densely populated residential area provides a suitable opportunity to meet needs; offering space for up to 171 residential dwellings as opposed to the 91 proposed for sites SHB013 and SHB015. The current Hawthorne Leslie site could be developed with residential properties to significantly improve the area of the Hebburn North ward; it can be done without effect to the river bed or operations within its neighbouring A&P Tyne. Indeed, Ellison Street, now being a heavily populated residential area with one access road to the site provides an opportunity to remove present risks and future disruption to those in the immediate vicinity. This proposal would meet the area's objectively assessed needs, be proportionate and taking into account alternative sites, be deliverable over the Local Plans 20 year vision period, and be consistent with national policy and the instructions of central government. |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED01 | | Support t | Strategic Economic Development (Strategic Policy) CPRE supports ED1 |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED02 | | Comme nt | Provision of land for General Economic Development (Strategic Policy) |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED02. 1 | | Support t | Wardley Colliery (Strategic Policy) - We welcome the proposed retention of most of the Local Wildlife Site within the Green Belt. |

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| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED03 | | Support | Provision of Land for Port and Marine Uses (Strategic Policy) - CPRE supports ED3 |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED04 | | Support | Protecting Employment Uses - CPRE supports Policy ED4 |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED05 | | Support | Employment Development beyond our Employment Allocations - CPRE supports ED5 |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED06 | | Support | Leisure and Tourism - CPRE supports Policy ED6 |
| ST22 85 | Gillan Gibson | CPRE | 06 Planning for Jobs | ED07 | | Support | Tourist and Visitor Accommodation - CPRE supports Policy ED7 |
| ST22 92 | Katie Wood | R&K Wood Planning LLP | 06 Planning for Jobs | ED02. 01 | | Comment | <p>Draft Local Plan</p> <p>The allocation of Wardley Colliery as an employment site and its release from the Green Belt as set out in Policy S1 (specifically criteria f and g) and Policy ED2.1 are supported. Policy ED2.1 states that any future development should seek to protect and enhance the wildlife site at Wardley Colliery and this is recognised as necessary in the terms of the NPPF. However, criteria (a) of this Policy ED2.1 is considered vital as it is recognising that this allocation must provide 16.5 hectares of employment land. In this context, it must also be acknowledged that the development of the Leamside Line, if it comes about over this plan period, may 'eat into' the area that is capable of being utilised for employment purposes.</p> <p>Policy ED2.1 appears to be assuming that the employment site and the Local Wildlife Site can be interlinked in the future; at the present time this is more than likely. However, it is considered that a flexible approach to the delivery of the employment land and the mitigation for the LWS, is required as this will ensure that the employment use is delivered in conjunction with the ecological mitigation required. Following further consideration and assessment of the site the boundary line between the employment site and wildlife site may not be as clear cut as on the plan. Flexibility in the exact location of employment land in relation to areas to be protected for the ecological value will help to ensure the most appropriate development for the site; a rigid approach could damage the ability to delivery employment land and protect wildlife. This flexibility may also assist in addressing the under provision of employment land that is identified in Table 2 of the Draft Local Plan.</p> <p>Draft Local Plan Interim Sustainability Appraisal</p> |

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| | | | | | | <p>The conclusion of the Draft Local Plan Interim Sustainability Appraisal is to allocate land to the west of the Wardley Colliery site for general employment purposes. The conclusion of paragraph 8.2, in relation to the release of a single employment site, is supported as well as the reasoning behind it i.e it is more likely to be attractive to the market.</p> <p>Option 3 in the SA, in relation to employment, as set out in Table 8.3 is supported as the need to release land in the Green Belt for employment and housing purposes is considered necessary and a decision which all Authorities in the North East appear to be coming to in relation to future growth.</p> <p>Overall, the conclusion of Table 8.4 and 8.6, in relation to the releasing land from the Green Belt and specifically the Wardley site is supported.</p> <p>The comments in paragraph 8.34 to 8.35 are noted in relation to the location of Wardley employment site, adjacent to a Local Wildlife Site, and the requirements for a mitigation strategy. The broad aims of these paragraphs are supported but in taking this recommendation forward the Council needs to be open to looking at this site in more detail in relation to the extent of land that can be allocated for employment purposes and the quality of the habitats contained within the colliery spoil to the east of the site. As stated above, a flexible approach will ensure that the LWS is enhanced while high quality employment is also delivered.</p> |
| ST23 15 | Neil Jones | Rapleys | 06 Planning for jobs | ED04 | Objecti on | <p>In terms of detailed policy comments, Siemens wishes to comment specifically on draft Policy ED4: Protecting Employment Uses. The policy, as currently drafted, states as follows:</p> <p>‘We will encourage and support economic growth and prosperity within the Borough by safeguarding land and buildings last used for employment purposes and (Rapleys emphasis) allocated under policies ED2, ED2.1 and ED3 as shown on the Policies Map’.</p> <p>The policy then goes on to set out a series of tests which would need to be satisfied if a site covered by this policy is to be redeveloped for alternative uses.</p> <p>It is our reading of this policy that it relates specifically to sites last used for employment purposes AND allocated for employment uses in the Plan. In other words, it would not apply to any non-allocated employment sites. This position is supported on the basis that it ensures maximum flexibility for the potential beneficial re-use of non-allocated employment sites during the Plan period and reflect national guidance on this particular matter.</p> <p>It is requested that the supporting text to Policy ED4 therefore includes specific clarification that the policy is not applicable to non-allocated employment sites that were last used for employment purposes, for the avoidance of doubt.</p> <p>We kindly request that these representations are taken into account in the ongoing preparation of the draft Plan, and request that we are kept informed of the further progress of the draft Plan and opportunities for consultation.</p> |

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| ST23 76 | Angela Beattie | | 06 Planning for Jobs | ED01 | | Comme nt | EMPLOYMENT The level of unemployment in the borough is high. How does South Tyneside Council reconcile this level of unemployment with the need to build additional homes. In addition Brexit will undoubtedly impact as immigration reduces and businesses re-adjust going forward. Please reply with an explanation of this point. |
| ST24 05 | Graham Black | Durham County Council | 06 Planning for Jobs | ED01 | | Comme nt | Employment The importance of IAMP is clearly recognised in terms of providing jobs for the future. It is considered that this significant investment in the north east can have wider benefits for the region including County Durham. This investment can grow the advanced and automotive manufacturing sector which can have economic benefits for businesses in County Durham providing further potential for supply chain businesses within this sector to expand and grow. The remaining employment land allocations identified within the Plan can support IAMP and also more local investment. The Port of Tyne and associated allocations are also recognised as being of importance to South Tyneside. The retail hierarchy proposed within the Plan appears logical and the need for flexibility in terms of uses within town centres is recognised and supported. The approach to the impact and sequential test in terms of new retail proposals is also supported. |
| ST24 08 | Dr Jonathan Richardson | | 06 Planning for jobs | ED06 | | Comme nt | <p>Firstly, I wish to register my support for all the Rugby recommendations laid out in the South Tyneside Playing Pitch Strategy February 2019: Page 22 https://www.southtyneside.gov.uk/media/41714/South-Tyneside-Playing-Pitch-Strategy-2019/pdf/South_Tyneside_Playing_Pitch_Strategy__2019.pdf with particular support for the recommendations “Existing quantity of rugby union pitches to be protected (unless adequately re-provided elsewhere in accordance with Sport England’s Playing Fields Policy Exception E4)”; “Seek to maximise use of the World Rugby Compliant 3G pitch at the Harton Academy, particularly for training to help address overplay” and most importantly “Should South Shields Westoe RFC not relocate to Temple Memorial Park, as part of South Shields & Westoe Club, then the alternative sites will need to be investigated given the current and future shortfalls on the site”</p> <p>South Shields and Westoe Rugby Football Club Juniors section currently fields teams from the ages of U7s to U18s and has to utilise venues across the borough and region for both training and matches due to the lack of adequate facilities at the current club at Wood Terrace; these include Harton School, Mortimer School, Temple Park, Harton Welfare and as far as Blaydon Rugby Football Club.</p> <p>We are unable to use the Rugby compliant 3G pitch at Harton School as it has been block-booked by a football team for 3 years and this has caused significant disruption to the junior section’s training programme in all age groups.</p> <p>We have teams visiting Westoe from all over the North East and quite frankly the current</p> |

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| | | | | | | | club is not fit for purpose; it undermines the efforts to attract tourists to South Shields for other leisure pursuits, and therefore undermines the South Shields 365 strategy, the Local Plan's Spatial Vision and Strategic Objectives and Policy ED6: Leisure and Tourism. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED01 | | Support | EBNF supports proposals that contribute towards building a stronger and more resilient local economy that will provide jobs for the residents of East Boldon. EBNF was recently consulted on Phase 2 of the International Advanced Manufacturing Park and raised concerns about its impact on East Boldon in terms of traffic and housing demand. We request continuing discussions on these issues. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED02 | | Support | Reference to 2.1 ha at Cleadon Lane Industrial Estate is supported. (Note the policy reference to Cleadon Lane as RG4 should be RG5) Our comments on re-use of Brownfield land under RG5 is also relevant here. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED03 | | Objecti on | Query application of policy The Employment Land Review (2019) states that with respect to specialist employment sites for port/river related uses, the table highlights the existence of a clear over supply in quantitative terms. It recommends that the Council may want to carefully consider whether it is necessary and appropriate to retain all of this land for specialist employment uses. Have the Council considered this in demonstrating the exceptional circumstances for going into the Green Belt? |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED04 | | Support | EBNF would seek to protect the viable business within the NP area. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED05 | | Comme nt | We would hope that EBNF is consulted at an early stage should such employment development be proposed on any sites within the NF area. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED06 | | Support | EBNF supports enhancement of diverse range of leisure attractions as evidence from our consultations shows support for the expansion of cycleways/walkways/sporting hub. |
| ST25 16 | Dave Hutchin son | East Boldon Neighbour hood Forum | 06 Planning For Jobs | ED07 | | Support | Support with reservations about parking EBNF supports this policy and would draw attention to the fact that Parking standards are not being met currently in the EBNF local hub areas; any increase in traffic due to expansion of dwellings, Metro services, tourism and leisure services will further impact on our parking problems and must be addressed. |
| ST25 28 | Hebburn Riverside Developm ent Limited | Bowyer Planning | 06 Planning For Jobs | ED3.6 | | Objecti on | 1. EXECUTIVE SUMMARY 1.1 These representations have been prepared on behalf of Hebburn Riverside Developments Ltd in response to the Council's emerging Local Plan (Regulation 18). Hebburn Riverside Developments Ltd owns the entirety of the Former Hawthorn Leslie Shipyard (the site) which is proposed to be allocated for 'Port and Marine' uses (Policy |

ED3.6)

1.1 The site, which has an area of approximately 3.7Ha, comprises of predominantly cleared land with large areas of hardstanding associated with its previous use along with the remains of two piers that extend into the River Tyne. Shipbuilding activities at the site ceased over 30 years ago and since this time the site has been vacant. Over this time there have been numerous and ongoing episodes of anti-social behaviour, vandalism, graffiti and arson at the site.

1.2 The site is an allocated employment site in the current Local Plan but has continued to remain vacant. Previous Employment Land Reviews (ELRs) undertaken in 2011 and 2014 identify a number of constraints associated with the site and acknowledge that there are other, more attractive, sites that would be better placed to meet future need.

1.3 Notwithstanding the above, the most recent ELR (2019) considers that the site could potentially be an appropriate location for offshore industry related facilities. We have undertaken our own review and consider that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries. This is due to an existing surplus of land of this type and there being numerous other locations within both the northeast sub-region, as well as the wider east coast of England, which offer numerous competitive, financial and locational advantages.

1.4 Irrespective of the above, as is clear from the Council's recent EIA Scoping Opinion Response, the existing intertidal mudflats and saltmarshes are considered to be ecologically important and should be retained as part of any redevelopment. It is considered that an employment use based on achieving river access would be incompatible with this objective. As such the proposed allocation of the site for 'Port and Marine' uses is not considered justified and as a consequence this allocation should be omitted from the emerging Local Plan.

1.5 As part of the emerging Local Plan process, the Council have identified a housing requirement of 7,000 new homes over the Plan period (2016-36). It is stated by the Council that there is insufficient previously developed land to deliver this level of housing and so it is proposed to release 114Ha of Green Belt land to meet this requirement.

1.6 Whilst we do not dispute that there may be a need to release some Green Belt land, we would question the robustness of the Council's review of available previously developed land given our conclusions on the need for our site to be retained in employment use.

1.7 We consider that the site is well placed to make a positive contribution to delivering new housing which is supported by the technical work undertaken. The proposed layout will also ensure no net loss in the extent of mudflats/saltmarsh across the site which would not be the case in the event that the site was developed for 'Port and Marine' uses.

1.8 In summary, we consider that Policy ED3.6 be omitted and the site instead be allocated for residential development capable of delivering approximately 170 new homes.

2. INTRODUCTION

2.1 These representations have been prepared on behalf of Hebburn Riverside Developments Ltd to the Council's pre-publication draft Local Plan (August 2019) in respect of our client's interest in the former Hawthorn Leslie Shipyard, Hebburn.

2.2 These representations respond to the proposed allocation of the Former Hawthorn Leslie Shipyard, hereafter referred to as the site, for 'Port and Marine' uses.

2.3 It is considered that this proposed allocation is not justified and given the need for new housing, it is considered that the site should instead be allocated for new housing. To support this position we have undertaken a review of the Council's latest Employment Land Review (ELR) and its conclusion in respect to the site.

2.4 Section 3 of this report sets out our case for the removal of the draft employment allocation whilst section 4 outlines why we consider a residential allocation to be more appropriate. This is followed by a concluding section which summarises our findings, outlining our recommendation.

The Site

2.5 Hebburn Riverside Developments Ltd owns the entirety of the site.

2.6 The site, which has an area of approximately 3.7Ha, comprises the former Hawthorne Leslie Shipyard in Hebburn. The site consists of predominantly cleared land with large areas of hardstanding associated with its previous use along with the remains of two piers that extend into the River Tyne.

2.7 Existing access roads and rail lines remain visible and given the length of time the site has been vacant a number of areas of scrub have become established.

2.8 Along the north western boundary of the site, an area of tidal mudflats and saltmarsh exist along part of the site's riverside edge. A copy of the site location plan is attached at Appendix 1.

2.9 The surrounding area has a mixed character with existing residential development to the south east and south west whilst existing vacant industrial land is situated to the north east. A large vacant industrial building is immediately adjacent to the site's eastern boundary with the River Tyne forming the site's north western edge.

2.10 The site is considered capable of delivering approximately 170 new homes, with an initial scheme being the subject of pre-application discussions with the Council in early 2019. In addition, an EIA Scoping Response request was submitted in July 2019, a response of which was received in September 2019. A copy of this response is attached at Appendix 2. This Scoping Request follows earlier screening/scoping requests submitted in 2014/15.

3. PROPOSED LOCAL PLAN ALLOCATION

3.1 This section of the document sets out our response to the proposed allocation of the site for 'Port and Marine' uses.

3.11 Furthermore, in 2014, the status, use and future potential of the site was further appraised by Lichfields. This update to the 2011 ELR included a site specific assessment of the Former Hawthorn Leslie Shipyard. The update states at this time there was limited demand for general employment and whilst there was potential for offshore & marine engineering uses a lack of a load-out area would reduce its attractiveness. It was also considered too remote for Port of Tyne. In summary, Lichfields concluded that redevelopment for employment purposes '...will require substantial site works to create a hard frontage to the river, raise the site, deal with contamination, protect or replace habitats, demolish and/or grub-up existing structures and renew on-site infrastructure. The costs of site preparation to allow redevelopment for employment use will be substantial'.

3.12 At paragraph 14 of Topic Paper 5, the report states that significant investment in the site is required and without this the demand for employment use is likely to be limited to relatively low value storage operations on the useable parts of the site. Furthermore, when assessing the potential of the site to attract manufacturing industries and maritime and offshore sectors, the site is considered by Lichfields to be disadvantaged when compared to other riverside sites on the Tyne.

3.13 As part of the emerging Local Plan, Lichfields have published an updated ELR. At section 5.44 of the report, when discussing the availability of employment land within South Tyneside, Lichfields confirm that, Vacant buildings such as at the former Hawthorn Leslie shipyard and Ashworth Fraser Industrial Estate, both at Hebburn, are very unlikely to be reoccupied and marketing activity is therefore no longer considered worthwhile.

3.14 Notwithstanding this conclusion, the ELR continues by assessing the potential the site could make towards meeting the need generated by the growth of off-shore wind and decommissioning of oil/gas infrastructure. The ELR refers to a study undertaken by WSP which assesses the opportunities and constraints of four sites which include the Former Hawthorn Leslie Shipyard. The findings of the WSP report are summarised and concludes that whilst the site has constraints it could accommodate potential offshore activities (paragraphs 6.57-.61). We have requested a copy of this WSP report but to date this has not been sent to us. Given the findings of the latest ELR report we have undertaken a detailed review of this to understand whether the site will realistically be an attractive location for offshore industry related facilities.

3.18 Whilst there is expected to be a large amount of growth in offshore industry, primarily coming from new wind power generation as well as decommissioning oil and gas infrastructure there are numerous competing locations that have a better existing offer. These include the presence / designation of Enterprise Zones (e.g. North Tyneside), larger

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| | | | | | | <p>areas / available sites (such as those in Sunderland), areas with simplified planning regulations (e.g. the LDOs in Northumberland) and up to date regeneration strategies (such as the recent Hartlepool LDO and Strategy).</p> <p>3.19 The east coast picture also points to there being multiple other ports and clustered locations that are better suited to development for offshore industry than South Tyneside, including Hull, Great Yarmouth and Lowestoft.</p> <p>3.20 Based on the above conclusions, it is clear that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries. This is due to an existing surplus of land of this type and there being numerous other locations within both the northeast sub-region, as well as the wider east coast of England, which offer numerous competitive, financial and locational advantages. These include the quantum of land (hence scale); a lack of constraints; a supportive policy environment; and financial and regulatory incentives for businesses to locate within these alternative locations.</p> <p>Other Relevant Considerations</p> <p>3.21 As has been highlighted, the site is subject to a number of constraints, including most notably intertidal mudflat and saltmarsh habitats.</p> <p>3.22 As part of discussions with the Council in respect to a potential residential redevelopment of the site, an EIA Scoping Opinion Response has been issued by the Council (see Appendix 2). This response attaches significant weight to the ecological importance of the saltmarshes and mudflats. The Council state that the saltmarshes and mudflats, being a fragile and not-easily replicated habitat should be protected where possible, referring to the NPPF which states that 'Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists' (paragraph 175). The response also acknowledges that development that encroaches on watercourses can have a potentially severe impact on their ecological value.</p> <p>3.23 This response highlights the importance of protecting and enhancing the habitats which surround the site. Given the apparent weight that the Council places on these habitats, we simply do not consider that the site's proposed allocation for 'Port and Marine' uses, which by their very nature need direct access to water, could effectively incorporate measures to protect the existing important ecological features.</p> <p>3.24 The EIA Scoping Response also highlights other considerations that any proposed redevelopment would need to take into account, namely remediation, changes to site levels and provision of an appropriate drainage scheme which will add significantly to the costs associated with development at the site.</p> <p>Summary</p> |
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| | | | | | | <p>3.25 The site is vacant and comprises of predominantly cleared land with large areas of hardstanding associated with its previous use along with the remains of two piers that extend into the River Tyne. Shipbuilding activities at the site ceased over 30 years ago and since this time the site has been vacant. Over this time there have been numerous and ongoing episodes of anti-social behaviour, vandalism, graffiti and arson at the site.</p> <p>3.26 The site is an allocated employment site in the current Local Plan but has continued to remain vacant. Previous ELRs undertaken in 2011 and 2014 identify a number of constraints associated with the site and acknowledge that there are other, more attractive, sites that would be better placed to meet future need.</p> <p>3.27 Notwithstanding this, the most recent ELR (2019) considers that the site could potentially be an appropriate location for offshore industry related facilities. We have undertaken our own review and consider that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries. This is due to an existing surplus of land of this type and there being numerous other locations within both the northeast sub-region, as well as the wider east coast of England, which offer numerous competitive, financial and locational advantages.</p> <p>3.28 Irrespective of the above, as is clear from the Council's recent EIA Scoping Opinion Response, the existing intertidal mudflats and saltmarshes are considered to be ecologically important and should be retained. It is considered that an employment use based on achieving river access would be incompatible with this objective.</p> <p>3.29 In summary, and for the above reasons, the proposed allocation of the site for 'Port and Marine' uses is not considered justified and as a consequence this allocation should be omitted from the emerging Local Plan.</p> |
| ST25 28 | Hebburn Riverside Developm ent Limited | Bowyer Planning | 06 Planning For Jobs | | Comme nt | <p>1. INTRODUCTION</p> <p>1.1 Boyer Planning has been commissioned by Hebburn Riverside Development Limited to undertake a review of the need for employment land in South Tyneside as part of their proposed redevelopment of the former Hawthorne Leslie shipyard for residential use.</p> <p>1.2 This review assesses the need for employment land, and land supply in South Tyneside, including looking specifically at sites with riverside / port access and with a particular focus on the potential development of offshore industry related facilities. This is in relation to the current (and potential continued) designation of the the former Hawthorne Leslie shipyard, Ellison Street, Hebburn as an employment site in South Tyneside Metropolitan Borough Council's existing and emerging Local Plan.</p> <p>1.3 Alongside this local analysis, the assessment also takes a wider view as to the supply of suitable employment land, particularly riverside and port located land that is geared towards offshore industries. This will encompass a sub-regional area that includes</p> |

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| | | | | | | <p>authorities along the River Tyne, the ports of Blyth, Sunderland and Hartlepool as well as other major identified ports along east coast of England.</p> <p>1.4 In addition to this study of appropriate sites, various documents are examined, including Local Plans and their supporting evidence base, Local Enterprise Partnership (LEP) Strategic Economic Plans as well as publications from Central Government in relation to offshore energy generation.</p> <p>1.5 This wider view and review of relevant organisations and their plans, aspirations and policy approaches for employment development (particularly in relation to offshore industries) will enable a conclusion to be drawn as to the appropriateness of the retention of the former Hawthorne Leslie shipyard for employment use.</p> <p>2. EMPLOYMENT LAND REVIEW FOR SOUTH TYNESIDE (JULY 2019)</p> <p>2.1 This section undertakes a review of North Tyneside Council's Employment Land Review (July 2019) (ELR), which was prepared for the Council by Lichfields. Our review considers the ELR's purpose, employment forecasts and how they were derived, the growth scenarios it illustrates, the consequent issues that arise from these and where they clash with a purported need to retain the designation of the former Hawthorne Leslie shipyard for employment uses.</p> <p>Purpose</p> <p>2.2 The ELR is an evidence-based input into the production of South Tyneside Council's Local Plan, written to provide the authority with 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. This is done to enable the implications of this growth with respect to demand for employment land over the period 2020-2035 to be taken into account, and planned for appropriately.</p> <p>2. EMPLOYMENT LAND REVIEW FOR SOUTH TYNESIDE (JULY 2019)</p> <p>2.1 This section undertakes a review of North Tyneside Council's Employment Land Review (July 2019) (ELR), which was prepared for the Council by Lichfields. Our review considers the ELR's purpose, employment forecasts and how they were derived, the growth scenarios it illustrates, the consequent issues that arise from these and where they clash with a purported need to retain the designation of the former Hawthorne Leslie shipyard for employment uses.</p> <p>Purpose</p> <p>2.2 The ELR is an evidence-based input into the production of South Tyneside Council's Local Plan, written to provide the authority with 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. This is done to enable the implications of this growth with respect to demand for employment land over the period 2020-2035 to be taken into account, and planned for appropriately</p> <p>Employment forecasts</p> |
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2.3 The forecasts set out in the ELR have been based upon a number of sources, which were then utilised to develop a series of projected requirements for the area over the Local Plan period. It has been left to the Council to determine the most appropriate scenario, with the consultants not making a recommendation as to which projection should form the basis for the Local Plan. These scenarios and sources included:

- Baseline employment forecasts (labour demand) based on Experian data;
- Policy-on employment forecasts (labour demand) to reflect the wider economic impacts of the International Advanced Manufacturing Park (IAMP) proposals. This scenario takes, as its starting point, the baseline employment forecasts by sector produced by Experian and adds to this dataset an allowance for the potential impact of IAMP proposals as envisaged through the Area Action Plan adopted in November 2017; and
- Consideration of past take-up of employment land as the basis for future economic needs.

2.4 These scenarios were calculated in two main phases, the first being the existing supply of employment land in South Tyneside and the second being the future requirements for space. The former was broken down into a number of stages including:

- The number of years supply of available employment land;
- The market attractiveness of available employment land;
- Demand for sites with river access over the Plan period;
- Readily available employment sites;
- The impact of vacant premises on the market for employment land; and
- Expansion land.

2.5 The latter was calculated by looking at forecast job growth and past take-up rates.

2.6 This calculation process resulted in the above-mentioned three scenarios, which the Council could utilise as the potential amount employment land to include in the Local Plan going forward. The conclusions from these three scenarios are set out below:
Scenario approaches and the impact on different land types

2.7 Looking at Table 1, the top end of the range for the general land requirements is underpinned by a policy-on labour demand scenario that seeks to capture the potential impact of IAMP on the general employment land market. Having regard to the importance of IAMP to the Council's wider planning and economic objectives, officers may take a view that the authority should (as a minimum) ensure the availability of sufficient land to meet this uplift in demand (17.19ha).

2.8 If, however, this approach were to be taken, then port / river related land requirements would be just 4.41ha over the plan period and likely render the former Hawthorn Leslie site (alongside with many others) surplus to requirements. The same applies to the baseline labour scenario, which is projecting very low needs for both types of land.

2.9 The Council may have to accept a large loss in general employment land (particularly in the manufacturing sector) if it were to pursue a port / river focused approach. It would be questionable as to whether it should be pursuing a scenario that would result in an overall loss of employment land, particularly as the Government wants local authorities to plan for growth.

2.10 In addition, the report goes on to state that in terms of general employment land there is current supply of 10.61ha which would appear to be sufficient in most cases to meet future growth needs, but could be insufficient if the Council seeks to pursue a Policy-on labour demand approach.

Viability issues for employment land in South Tyneside

2.11 In terms of the likelihood of the development of other land types (as opposed to offshore industries), it is noted in the ELR that for town centre office uses, 'demand is thin and rents are generally too low to allow speculative office development' (p.41). To further compound this issue for office related developments in South Tyneside, any 'substantial office development in the City Centre [of Sunderland] will largely meet demand from within Sunderland but may draw some demand from the neighbouring authority areas including South Tyneside'.

2.12 Office uses on out-of-town developments appears to suffer from the opposite issue, in that there is currently around 1 million sq. ft. of vacant office floorspace in former Enterprise Zones. Until the market has absorbed this space and values have recovered, large floorplate out-of-town office development activity within much of Tyne & Wear is likely to be suppressed.

2.13 This combination of longstanding issues suggests that the projection for a higher level of need for office floorspace in South Tyneside envisioned under a past completions scenario is unlikely to be realistic. As noted on p.42, 'Office rents are still someway short of their 2008 levels and with construction costs having risen, viable speculative office development is unlikely for the foreseeable future'. Therefore this type of development 'requires not only public sector funding to cover the gap between construction costs and end values, but also, with banks still reluctant to provide development finance, loan finance too'.

2.14 This poor outlook for office development casts doubt on the soundness of the past completions projections as a basis for plan making. It therefore also calls into question the higher level of port / riverside related land need envisioned under this scenario, and implies that a lower amount of land may be required in future.

2.15 When it comes to the viability of general industrial sites, it is noted that in 'locations that are more distant from strategic highway junctions, rents are lower and speculative private sector industrial development has been reliant on public sector gap funding or EZ

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| | | | | | | <p>incentives’ (p.43). Alongside this, ‘substantial opportunities exist at Wallsend on the north side of the Tyne for the development Riverside / dockside related land requirement.</p> <p>2.16 The net land requirement for river / dockside related uses identified a range from 3.06ha to 19.46ha (see Table 1 above). The lower figure is underpinned by the baseline labour demand scenario, whereas the higher figure is based on past completions data. The report states that due to the strength of historic development activity at the Port of Tyne (accounting for nearly 40% of all take-up across the Borough over the last 15 years) the Council may want to take a view that planning towards the lower end of the range risks significantly under-providing for such uses over the Plan period.</p> <p>2.17 In contrast to the above, the ELR highlights the existence of a clear quantitative oversupply, even against the upper estimates for potential future need for this type of land (see p.p.4-5 of the ELR). The oversupply is in excess of 15ha, even after adding an additional two years land supply to ensure there is further capacity if required. This suggests that there is no localised need for the provision of any additional land for this purpose, and that some land could be lost from the existing stock and there would still be sufficient headroom to meet the Council’s land requirements for this sector.</p> <p>Offshore energy related need</p> <p>2.18 Offshore industries look likely to continue to grow, led primarily by offshore wind power. The more traditional oil and gas exploration and extraction from UK fields in the North Sea are now more focused on decommissioning and how best to access the available sources whilst making efficiency gains, with production for these peaking in the 1980s. of offshore industrial locations’.</p> <p>2.19 Projected growth in the offshore wind sector, coupled with government support for this type of energy generation through the signing of a UK-wide sector deal means that demand for sites and facilities will most likely continue in future at a national level. However, this review focuses upon the regional need for offshore industry land.</p> <p>2.20 Despite this high level of projected future growth as noted in the ELR, there is more than enough land to meet the projected future needs of ports / riverside related developments in South Tyneside. This is set out on p.5 of the ELR in table iv which sets out that there is a supply of 37.17ha of Specialist Employment Land (Port / River) compared to an upper level demand of 22.09ha, leading to a surplus of 15.08ha of this type of land in the borough.</p> <p>Hawthorn Leslie shipyard site</p> <p>2.21 Turning to look briefly at the site itself, the 3.7ha of land encompass a riverfront location and the site predominantly comprises vacant hard standing, concrete slabs from previous buildings that have since been demolished and bare land. There is also a small cluster of derelict buildings in the southern corner of the site.</p> |
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2.22 One of the key components of making this site viable / attractive to offshore industry is its location on the banks of the Tyne. However, as noted in paragraph 6.33 of the ELR, a proposal to reclaim mud flats on the river's edge to provide additional land has been resisted by the Council on ecological grounds. This casts doubt on the sites ability to make use of its riverside location and therefore its suitability for development as an offshore industry employment location.

2.23 Alongside previous Council resistance to the development of the riverbank, it could also be argued that it is counter-intuitive to seek to develop land to enable an environmentally friendly industry to grow, whilst in the process of doing that, damaging / destroying an ecological asset. Therefore, sites that have ecologically valuable river frontages should not be developed to have river access, as would be required by those that need access to waterways as part of offshore industries. This would eliminate one of the primary advantages the Former Hawthorne Leslie shipyard and render one of its main reasons for retention as employment land null and void.

Conclusions drawn from the ELR

2.24 Overall, it is clear that there are multiple issues in relation to the retention of all the land the Council seeks to retain for employment use, especially in relation to riverfront / port uses. This is not only due to the oversupply (in excess of 15ha) of land (even against the highest levels of projected need with an additional buffer added) for these types of uses, but also the apparent conflict between its projections under the past completions scenario.

2.25 Under this scenario, there is apparently a need for almost 15ha of general employment land office floorspace, despite the identification of there being little to no market for town centre offices in South Tyneside (due to Sunderland and Newcastle being more important centres), alongside a massive surplus of out-of-town properties that are currently vacant. This subsequently raises questions as to the validity of the projected requirement for nearly 20ha of port / riverside development (B8) land under this same scenario.

2.26 Alongside the apparent lack of need for office provision, there are also issues with the provision of industrial floorspace, with much of it requiring public sector subsidy / assistance, as well as an identified large stock of land on the opposite bank of the Tyne. This further reinforces the conclusion that there is already a significant amount of land in the vicinity that is suitable for development and occupation by offshore businesses, and as the Council has already identified a surplus of land for port related uses in the Borough, there is no need for all of it to be retained for that use.

2.27 Another point to note is that the ELR is highly focused upon South Tyneside, and does not look in detail at the wider context of the potential future land supply of offshore

industry sites in neighbouring authority areas, nor at the wider northeast regional context. This review considers the wider context in the following chapter.

3. THE NORTH-EAST SUB-REGION

3.1 This chapter considers the wider context of offshore wind development at a regional level by looking at the North East LEP and its work on economic development. It will then look at employment in offshore industries in South Tyneside and other relevant local authorities within this northeast 'sub-region'.

3.2 Following on from this, the Local Plans and supporting documents are reviewed for each of these local authorities to determine how much land they may already have, to what extent they have planned for, and what provision they are planning to make to assist the growth of offshore industries going forward.

3.3 This check of their level of accommodation / planning for offshore industry will enable conclusions to be drawn as to how positive the policy environment in which any proposed offshore development might come forward in may be.

Offshore wind sector deal (2019)

3.4 This sector deal was signed in March 2019, and sets out that the Government is looking to support the growth of this sector over the next decade to 2030. To this end, the industry is expected to invest £250 million as part of the Offshore Wind Growth Partnership to develop the UK supply chain, as global exports from the UK are set to increase fivefold to £2.6 billion.

3.5 As a result of the growth and development of this sector, 30% of British electricity is expected to be produced by offshore wind power by 2030, as part of the Government's modern Industrial Strategy. It is also predicted that the offshore wind energy generation sector could see the number of jobs triple to 27,000 over the same timeframe.

3.6 Nationally by 2030, there is expected to be an increase of 18,000 jobs in the sector. Based upon an employment density of one job per 35sqm (reflecting mixed B1, B2 and B8) this growth would support 630,000sqm of floorspace. Applying a plot ratio of 0.5 this equates to a national requirement of 126ha.

North East Local Enterprise Partnership Strategic Economic Plan

3.7 This Strategic Economic Plan (SEP) sets out that (inter alia) expertise in offshore energy and subsea technologies, regional energy and innovation is one of the most important industries in the North East Local Enterprise Partnership (NELEP) area.

3.8 The SEP sets out that one of the region's strengths is that there are three major ports, (Blyth, Tyne and Sunderland), providing 7km of quays next to deep water, and easy access to 400ha of development land. It is notable that Blyth has Energy Central, a deep-water offshore energy base across its estuary, as well as the Offshore Renewable Energy Catapult's £150 million National Renewable Energy Centre. Other highlighted projects are

in various locations around the region including Durham, Gateshead and Newcastle, but none of these are located in South Tyneside.

3.9 In addition to this SEP, the LEP is in the process of developing a North East Local Industrial Strategy (LIS), which is due to be published in 2019. This LIS would again highlight the opportunities available for the region if it develops its offshore wind industry. Employment in offshore industries in the northeast sub-region

3.10 The local authorities analysed as part of this 'sub-region' have been selected as they feature significant existing port infrastructure. Alongside this, having undertaken initial research into them and other potential locations along north east coast, they were deemed the most suitable comparators due to the existing presence and future desire to develop offshore industries. The authorities included in this 'sub-region' include:

- South Tyneside;
- North Tyneside;
- Sunderland;
- Northumberland; and
- Hartlepool

3.11 Office for National Statistics Labour Market Survey data from 2017 has been utilised to enable a comparison to be drawn between the various local authorities within the wider sub-region of the northeast. The manufacturing sector has been used as a proxy for jobs in the offshore industry as this type of business is the most likely to occupy the former Hawthorn Leslie shipyard site, if it were to be developed for an employment related use.

3.12 Whilst it is acknowledged that not all manufacturing jobs will be in businesses engaged in various offshore-focused industries, as there is no specific breakdown to focus on offshore, this was deemed the most suitable measure. The other categories of work that the ONS breaks employment down into that could be engaged in offshore industries include:

- Electricity, Gas, Steam and Air Conditioning Supply;
- Construction;
- Transportation and Storage; and
- Professional, Scientific and Technical Activities.

3.13 Having taken these other categories into consideration as potential alternative measures, it was deemed that many of these were likely to be focused more on 'on-land businesses', especially construction and transportation and storage.

3.14 The table below sets out the number and percentage of people who are employed in manufacturing in each of the local authorities outlined above. These figures are based on the number of people who are employed, not the total population of each of the areas.

3.15 As can be seen from Table 2 above, South Tyneside has a relatively low number of people (the second lowest in simple numeric terms) of people employed in manufacturing.

When a comparison is subsequently drawn between South Tyneside and the authority with the lowest amount of people in manufacturing (Hartlepool), it also shows that South Tyneside, despite having a higher number, actually has a lower percentage of its employed population in the manufacturing sector (11.6% compared to 13.3%).

3.18 The Council has designated on its Proposals Map a long land strip (including Enterprise Zones, Available and Reserved Employment Land) along the northern bank of the River Tyne, including sites opposite the former Hawthorne Leslie shipyard. This area falls under policy 'S2.2 Provision of Land for Employment Development' in their Local Plan (2017). Under subsequent 'Policy 2.5 River Tyne North Bank', it states that:

'Across the River Tyne North Bank area, as identified on the Policies Map, and specific locations identified below, proposals for all forms of employment development will be supported to enable economic growth, investment and regeneration of the area where they do not restrict riverside access that could compromise the capacity of the River Tyne North Bank to support marine and off-shore related industry.

'Across the River Tyne North Bank area, as identified on the Policies Map, and specific locations identified below, proposals for all forms of employment development will be supported to enable economic growth, investment and regeneration of the area where they do not restrict riverside access that could compromise the capacity of the River Tyne North Bank to support marine and off-shore related industry.

The Council will support and encourage further development and investment in the advanced engineering, manufacturing and renewables sector providing a range of office and manufacturing space, with access to multi-purpose hard standing and deep-water berths, and additionally to the provision of accommodation for training and education in related sectors, across the River Tyne North Bank area'

3.19 This demonstrates that there is a significant commitment to further offshore development on the northern bank of the River Tyne, though there are no specific sites, amounts of land or floorspace that are expected to come forward for offshore industrial uses.

3.20 The Council's Employment Land Review (2015), states that 'new':

'Enterprise Zones have been established one of which in North Tyneside is located at the River Tyne North Bank and at the Port of Tyne comprising a cluster of three sites totalling more than 70 hectares. They form one of five Centres for Offshore Renewable Engineering (CORE) across the UK and focus on advanced manufacturing (subsea), offshore (oil and gas) and renewables.' (p.21).

3.21 This sets out that the Council is looking at developing in the region of 70ha of land for offshore industrial uses, particularly given the central Government designation of one of the locations as a CORE area.

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| | | | | | | <p>3.22 Within North Tyneside, there is a large amount of land that can be brought forward for offshore industrial uses that benefit from delivery terms and EZ financial incentives. This provides the north bank of the Tyne with a distinct commercial advantage to land on the south side, including the former Hawthorne Leslie site.</p> <p>Sunderland City Council</p> <p>3.23 The emerging Core Strategy and Development Plan (which is currently going through public consultation on Main Modifications until 25 October 2019) sets out under Policy SS5 that ‘The Port of Sunderland... will be reinvigorated through... enabling development of port related uses within Use Classes B1, B2 and B8, including offshore renewables and automotive supply chains’. Similarly to North Tyneside Council, there are no specifics as to the amount of land or floorspace that the Council is seeking to plan for in for offshore development.</p> <p>3.24 The supporting Employment Land Review (2016) sets out two locations that are also identified in the Core Strategy for offshore-related development including the former Pallion Shipyard and the Port of Sunderland itself (see paragraph 2.27). As with the other documents and studies noted above, no potential amounts of land or floorspace have been detailed as part of this identification.</p> <p>3.25 The Port of Sunderland has Enterprise Zone status and the Port’s website identifies two key opportunity sites that total 10ha of land that fall within the EZ and therefore benefit from substantial incentives to bring them forward.</p> <p>Northumberland County Council</p> <p>3.26 Two of the main documents that highlight the importance of Blyth as a location for offshore development are the Bates Site, Blyth Local Development Order (2013) and the East Sleekburn Sites Local Development Order (2013). These set out that they cover 8ha and 21ha of land that would be suitable for offshore wind development, with a further 44ha of land at East Sleekburn that could also provide a suitable location for associated businesses.</p> <p>3.27 Both are in close proximity to the National Renewable Energy Centre (NaREC), the national centre for excellence in renewable energy, dedicated to the development, growth and commercialisation of new and renewable technologies. NaREC has invested over £150 million of UK government, private sector and EU funding to create a unique portfolio of independent facilities in Blyth.</p> <p>3.28 These documents also highlight that one of the main opportunities for this area is the development and growth in offshore industries. For example, these sites are in an ideal location to serve the Crown Estates Round 3 offshore wind farm zones, including Dogger Bank in the North Sea.</p> <p>3.29 The Bates site may be of particular interest to developers wishing to utilise the existing on-site deep-water quay facilities, including Wimbourne Quay, which can</p> |
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| | | | | | | <p>accommodate vessels of around 160m long. Storage areas with load bearing capacity are available and the quay has been further strengthened. The Sleekburn sites may also be attractive due to their far larger sizes, allowing for greater agglomeration of associated businesses and enabling a supply chain to develop.</p> <p>3.30 This Bates site, although relatively small, is however highly likely to be developed for offshore-related uses as:</p> <p>‘The other key criterion is for development to be within the target sectors of manufacturing, maintenance and servicing of plant, machinery, equipment and parts for off-shore industries; advanced manufacturing and technology; port and logistic related businesses; and storage and distribution linked to off-shore industries’. (Paragraph 3.10).</p> <p>3.31 The development of these sites for offshore-related businesses would complement existing offshore companies in the area and reinforce Blyth as a major centre of the industry in the northeast, attracting further development, approximately 10-12 miles north of the former Hawthorne Leslie site.</p> <p>3.32 A more recent document produced by Northumberland Council is the Employment Land and Premises Demand Study (2015). This sets out that in Blyth there are opportunities of around three offshore wind energy zones (p.145), with ‘Opportunities for growth in renewable energy and offshore industries and Port related sectors is expected to stimulate demand for land and premises in and around the Port’ (p.139).</p> <p>3.33 It should be noted however, that this document takes a somewhat more pessimistic view of development of the offshore industry in the northeast as it states:</p> <p>‘The offshore wind sector has not brought the hoped for levels of investment; notably Siemens chose to locate in Hull rather than the North East.’ (p.p.134-135).</p> <p>‘Agents observed that the offshore renewables sector is being targeted by port towns along the east coast of England and it is generally thought that there is not enough demand to go around.’ (p.137).</p> <p>‘Opportunities for growth in renewable energy and offshore industries and Port related sectors is expected to stimulate demand for land and premises in and around the Port, but such development aimed at specific sectors may be impacted by viability particularly having regard to the abnormal costs of developing brownfield sites and public sector support will be needed.’ (p.139).</p> <p>3.34 This could indicate (along with the long-term vacancy and potentially significant remediation costs) that the former Hawthorne Leslie site may also struggle to attract offshore investment. Again, like many of the other documents reviewed here, there were no specifics as to the amount of land or floorspace that the Council was seeking to develop for offshore industry uses.</p> <p>3.35 In terms of the Council’s Local Plan, this is currently going through the examination process (and is at a similar stage to the Sunderland Local Plan). This document is far more</p> |
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| | | | | | | <p>recent than the other Northumberland documents reviewed above, and it states at paragraph 2.51 that:</p> <p>‘Blyth has a strategically important employment function. There is significant economic growth potential around the Blyth Estuary, which includes sites with Enterprise Zone status. Opportunities exist that build on existing assets including the national Offshore Renewables Catapult, and the Port of Blyth which is a sizeable commercial port with a deep-water harbour and warehousing facilities. Specific sectors being targeted include offshore oil and gas, renewables and advanced manufacturing.’</p> <p>3.36 Paragraphs 2.56 and 5.15 develop on this further by noting that one of the key opportunities for future economic growth is the Blyth estuary area as it is being actively promoted to the renewable and low carbon energy, advanced manufacturing and offshore sectors. This is assisted by it being approximately equidistant between Dogger Bank and the Firth of Forth.</p> <p>3.37 This positivity about the future prospects of the offshore wind industry to grow and develop at Blyth are set into formal policy under ‘ECN2 Blyth Estuary Strategic Employment Area (Strategic Policy)’. This states that ‘Land at Blyth Estuary is allocated as a ‘Strategic Employment Area’ within which the following sectors within the B-Class industrial uses will be prioritised: ... b. offshore and sub-sea engineering’.</p> <p>3.38 This sets out a more positive approach to the development of land, but does not set out any floorspace or hectare aspirations or allocations specifically for offshore-related development.</p> <p>3.39 The Port of Blyth has a significant amount of land available (circa 45ha) the majority of which has EZ status and associated incentives to bring development forward.</p> <p>Hartlepool Borough Council</p> <p>3.40 The Hartlepool Local Plan (2018), through subsection (a) of policy ‘EMP4: Specialist Industries’ sets out that the port area is a significant potential location for future offshore and renewables development. It highlights that the total area is 106.1ha, of which 60.1ha is available for port related industrial development and renewable energy manufacturing, with a 79ha being included as part of the EZ LDO.</p> <p>3.41 The Local Plan also recognises the potential for offshore renewables to assist with the economic development and regeneration of the area. One example of this is paragraph 6.4, which states that the owners of the port have:</p> <p>‘expressed their intension to focus on port-related development including offshore wind and sustainable energy solutions. This is fully supported by the Borough Council and is reflected by the Enterprise Zone designation of the port and the Local Development Order which supports it’. (p.18).</p> |
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| | | | | | | <p>3.42 In addition, paragraph 11.12 of the Local Plan states that the Hartlepool Economic Regeneration Strategy (2019-2021) has identified strategic sites for the offshore sector, again, principally at the port.</p> <p>3.43 The Economic Regeneration Strategy sets out that one of Hartlepool's key assets is the ABLE Seaton Port, which is a 51ha site of an operational deep-water port in the mouth of the Tees, of which 10ha is a dry dock. ABLE has invested over £120m since acquiring the site in 1996, providing reinforced quayside facilities and establishing oil and gas decommissioning operations and an installation of the foundation package for Orsted's Hornsea One Wind Farm. In addition, it has also secured the installation of the turbine package for Innogy's Triton Knoll Offshore Wind farm, which is due to commence in September 2020. Hartlepool also hosts a number of other offshore wind companies including JDR Cables and EDF (Teesside Windfarm O&M).</p> <p>3.44 As mentioned above, the port's Local Development Order (2019) supports the development of offshore businesses, as it states that advanced engineering and manufacturing (including renewable energy) will be appropriate at the port.</p> <p>3.45 The LDO also highlights that the port is part of the Tees Valley Enterprise Zone, which covers 12 individual sites with a total area of over 425ha. This encompasses a wide range of locations, including a number with existing office space as well as units on large cleared industrial sites. On each one, businesses are able to benefit from tax relief, simplified planning regimes and superfast broadband. Four offer Enhanced Capital Allowance, with a further eight offering Business Rate Relief.</p> <p>3.46 An earlier, but more detailed document (The Employment Land Review (2015)) sets out potential and existing sites related to offshore industries including Victoria Harbour North Docks (47.5ha) and Graythorp Yard (which has 9,000sqm of indoor fabrication, warehousing and storage space and over 3,000sqm of office facilities) used to decommission offshore oil facilities. McDermott has also taken a site to operate as pipe spool base at the Port. The site, of approximately 12ha, enables McDermott to assemble long line pipe stalks that are spooled to their pipe-laying vessel for offshore oil and gas works.</p> <p>Sub-regional summary</p> <p>3.47 It is clear that having reviewed the emerging and adopted Local Plans (and relevant supporting documents) for the neighbouring authorities, as well as those that sit within the wider northeast 'sub-region', that there is a strong focus on offshore industry and numerous local authorities are keen to allocate or retain land to enable the sector to grow. This shows a healthy and on-going competition to bring offshore industries to various locations across the northeast.</p> <p>3.48 Many of these competing locations have existing national centres of expertise (e.g. Blyth), have allocated significant areas of land, often within a wider identified network of</p> |
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sites / locations (e.g. Hartlepool and the wider Tees Valley), have allocations in their Local Plans (Sunderland), contain EZs, or have other financial incentives for businesses to relocate to their area(s) (North Tyneside). In combination this demonstrates that there are many other larger, better-connected locations that have a scale and mass, complemented by (frequently multiple) financial incentives and existing businesses / supply chains which companies would find far more attractive than the 3.7ha former Hawthorn Leslie site.

3.49 In addition to there being a number of competing locations, it should be noted that smaller, less competitive sites (that may have multiple issues such as contamination, remediation and ecological concerns) are inherently less attractive. This raises questions about the suitability of a potentially marginal site like the former Hawthorne Leslie shipyard, and its continued retention for employment uses.

4. THE EAST COAST VIEW

Key east coast ports

4.1 As set out by Government, there are five identified Centres for Offshore Renewable Engineering:

- Hull and adjacent parts of the East Riding, and South Humber Bank;
- Great Yarmouth and Lowestoft;
- Tyneside;
- Teesside; and
- Sheerness

4.2 These are partnerships between Central and Local Government and LEPs that ensure businesses looking to invest in manufacturing for the offshore renewables industry receive comprehensive support.

4.3 The areas were selected as the Government considered that they offer the right infrastructure for offshore wind manufacturing, access to a skilled workforce, an experienced local supply chain and committed local leadership. They also offer access to excellent R&D facilities and collaborative opportunities across the UK. On this basis, they will be used as comparator ports / locations to assess the strength of competition for offshore development in comparison to South Tyneside.

4.4 As Tyneside and Teesside have already been covered in the previous section (having looked at North and South Tyneside as well as Hartlepool and the Tees Valley Enterprise Zone), this section will now focus on the other locations listed above, starting with Hull (and the surrounding areas), moving southwards to Great Yarmouth and Lowestoft, before finally looking at Sheerness.

Hull and the surrounding areas

4.5 The Local Plan (2017) sets out that it has allocated large areas of land as part of a growth strategy for employment land, including port uses. This approach is supported by the recent development of 56ha at Alexandra Dock by Siemens for a wind turbine

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| | | | | | | <p>production and servicing facility (see paragraph 4.7). However, as the impact of this on the supply chain and its requirements is still to fully emerge, there would appear to be the need for additional employment land related to this offshore industry, particularly as part of Green Port, which is supported by the designation of EZ Status on a number of sites.</p> <p>4.6 Green Port offers a range of benefits including over 500ha of employment land, some with direct quayside access, a strategic location within 12 hours' sailing time from three major Round 3 wind farm zones and a programme of investment totalling £1 billion that is underway.</p> <p>4.7 Approximately 126ha is identified in the Plan to meet general market needs. A significant amount of land within the Port of Hull estate is specifically identified to accommodate Original Equipment Manufacturers (OEMs) at Green Port, with approximately 49ha of land identified within the Hull administrative boundary.</p> <p>4.8 The Port of Hull is a gateway to international trade, operating as one of the UK's leading foreign trade ports. It is the stated intention of Associated British Ports (ABP) to continue to invest in the future growth and development of the Port, responding to market trends and demand. The Port estate within Hull is extensive covering a large part of the city's frontage with the Humber Estuary, with the estate's ownership stretching into the East Riding of Yorkshire, including operational port land in the form of the Saltend Chemical Park, as well as development land at Hedon Haven.</p> <p>4.9 The Albert & William Wright Docks also continue to provide an important operational port facility to the west of the city, with the suggestion by ABP that they have potential to become an offshore wind terminal with associated development land within the Port estate to support this role.</p> <p>4.10 As can be seen from the above, Hull and its surrounding areas are an established port with an offshore focus, but also with interests in other areas. The large amounts of available land with a supportive Local Plan in place demonstrate that this location provides a highly suitable area for future offshore industry related developments.</p> |
| ST2528 | Hebburn Riverside Development Limited | Bowyer Planning | 06 Planning For Jobs | ED3 | Objection | <p>Great Yarmouth and Lowestoft</p> <p>4.11 Policy CS6 – Supporting the local economy of the Local Plan (2015) sets out the Council's approach to employment land including its port. Subsection (e) states that the Council will support 'port-related development proposals relating to the Outer Harbour and existing river port, in particular encouraging cargo handling and other port-reliant activities'. The following point (f) sets out that they want to encourage 'a greater presence of higher value technology and energy-based industries, including offshore renewable energy companies'.</p> <p>4.12 There is 53ha of undeveloped land, of which 25ha is unconstrained, and 28ha is subject to some constraints to immediate development, according to the policy's supporting text. In addition, the extension to Beacon Park (an industrial park located adjacent to the port) is considered suitable for new developments of employment land related to offshore industries. There is also longer term</p> |

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| | | | | | | <p>potential for land reclamation at South Denes to provide additional space with access to deep water, which could provide up to 42ha of new employment land.</p> <p>4.13 As with Hull, there is strong support in the Local Plan, with a large amount of surplus employment land being readily available in Great Yarmouth for offshore industrial developments.</p> <p>4.14 For Lowestoft, one of the key objectives for the town in the Waveney Local Plan (2019) (though it should be noted that the local authority for the area is now East Suffolk Council as of 1 April 2019) is to ‘Support Lowestoft Port and capitalise on the growth of offshore renewables and offshore related engineering’ (p.44).</p> <p>4.15 PowerPark, identified under Policy WLP22.2 is a key area for offshore focused development in Lowestoft, covering 23.37ha and is formally allocated for employment development (use classes B1, B2 and B8) and port related development. The supporting text to this policy identifies that there is huge potential for growth in the area associated with the development of offshore wind farms as evidenced in the Employment Land Needs Assessment (2016) and the Assessment of Land Requirements to Support Offshore Energy and Engineering in Waveney (2018).</p> <p>4.16 The East Anglia Array, which is located just off the coast of Lowestoft, will be one of the largest wind farms in the world with a capacity of up to 7GW. The first phase of this scheme has consent and the Outer Harbour, which forms part of the PowerPark, has been chosen as the construction management, operations, and maintenance base for the phase. The second phase is now being considered for consent and four further phases are being progressed towards the planning application stage. In total, it is estimated that at least 1,500 new direct and indirect jobs will be created in Waveney because of these developments.</p> <p>4.17 Alongside this future growth, it should be noted that this area is already home to established offshore energy sector businesses including Greater Gabbard Wind Farm, East Anglia Offshore Wind and Sembmarine SLP. It is also home to OrbisEnergy, which provides office space for businesses focused on the energy sector. The future objective for this site is to further enhance this cluster through new development and redevelopment and re-use of existing premises within the site.</p> <p>4.18 In addition to offshore wind, there are also opportunities for growth from other offshore-related sectors, including oil and gas and other offshore renewables. The Outer Harbour is also home to the Lowestoft fishing industry, which has the potential for growth as noted in the Assessment of Land Requirements to Support Offshore Energy and Engineering in Waveney (2018).</p> <p>4.19 This area has had long-term support for offshore wind development, as evidenced by the PowerPark Demand and Need Report (BVG Associates, 2009) which identified that it is well placed to capitalise on growth in the offshore energy sector. This was formalised into policy through the Lowestoft Lake Lothing & Outer Harbour Area Action Plan (2012) which identified the site as the focus for a cluster of offshore-related businesses.</p> <p>4.20 In addition to Policy WLP2.2, Policy WLP2.10 – Inner Harbour Port Area states that ‘Within the Inner Harbour Port Area land and buildings will be retained in port and other associated uses’. The supporting text outlines that the port is ‘servicing the emerging offshore renewables sector as well as the established oil and gas sector’ with a particular focus on South Quay as it ‘is a heavy lifting quay in separate private ownership and is valuable in supporting offshore renewables, engineering, oil and gas sectors and Sizewell [power station]’.</p> |
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4.21 Overall, it is clear that both Great Yarmouth and Lowestoft have great potential for offshore wind industry development and have a long running track record of supporting this type of development in their areas. Great Yarmouth has identified significant quantities of available land for development and plan to maintain a surplus of employment land to ensure there is sufficient headroom for this emerging industry in future. Lowestoft has evidence and policy going back over a decade promoting and supporting offshore development as a key part of its employment strategy, and there is already a notable cluster of offshore-related companies established in the town.

Sheerness

4.22 The Council's Local Plan (2017) sets out at paragraph 5.2.45 that the Port of Sheerness has access to deep-water berths, which makes it a suitable location for wind turbine manufacture and assembly, and planning permission already exists for this use. As there is potential for longer-term expansion for further berthing facilities, the Port operator has prepared a Masterplan, which looks 20 years ahead.

4.23 This Masterplan contains numerous objectives including reclaiming up to 125ha of land to expand the size of the port, incorporating a neighbouring 20ha steelworks within its boundaries and the infilling of existing waterbodies to provide additional space.

4.24 Although there is comparatively little information and planning guidance in Sheerness in relation to offshore industrial development, it should be noted that this port / location would be the least likely to be in or provide competition for South Tyneside (out of the five CORE areas) due to the distance (over 260 miles) between the two locations.

Conclusion on the offer of east coast ports

4.25 Overall, it has been shown (with the exception of Sheerness) that the other CORE locations all provide large amounts of designated land for offshore industrial development, that are frequently paired with significant financial and other (de)regulatory incentives, alongside significant policy and evidence-base support from the local authority. This combines to provide an impressive offer with which to draw in offshore businesses.

4.26 In comparison, a much of the land that is purported to be available, designated and suitable in South Tyneside is comparatively restricted (e.g. by environmental constraints along the riverbank), and there is already more land than is projected to be required, according to the Council's own study. This demonstrates that there are numerous other locations that are likely to be developed ahead of those in South Tyneside, and even at a wider level (if seeking to form an agglomeration / cluster in future), there are already existing locations with a far superior offer available.

5. CONCLUSION

5.1 Boyer Planning has been instructed by Hebburn Riverside Developments Limited to undertake a review of the employment land needs for South Tyneside.

5.2 Having reviewed the Councils recent ELR it is clear that there is an excess supply of riverfront / port land within South Tyneside, as, even when looking at the scenario with the greatest level of growth within this sector there is already over 15ha of surplus land. It is also apparent that there is a lack of need for office provision, as well as issues with the provision of industrial floorspace, with much of it requiring public sector subsidy or assistance. This need for financial subsidy is compounded by the availability of land and premises within an Enterprise Zone on the north bank of the Tyne (in North Tyneside).

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| | | | | | | <p>5.3 Whilst there is expected to be a large amount of growth in offshore industry, primarily coming from new wind power generation as well as decommissioning oil and gas infrastructure, there are numerous competing locations that have a better existing offer. These include the presence / designation of Enterprise Zones (e.g. North Tyneside), larger areas / available sites (such as those in Sunderland), areas with simplified planning regulations (e.g. the LDOs in Northumberland) and up to date regeneration strategies (such as the recent Hartlepool LDO and Strategy).</p> <p>5.4 The picture further along the east coast also points to there being numerous other ports and clustered locations that are far better suited to the development of offshore industrial uses than South Tyneside, including Hull, Great Yarmouth and Lowestoft.</p> <p>5.5 Based on the above conclusions, it is clear that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries. This is due to an existing surplus of land of this type and there being numerous other locations within both the northeast sub-region, as well as the wider east coast of England, which offer numerous competitive, financial and locational advantages. These include the quantum of land (hence scale); a lack of constraints; a supportive policy environment; and financial and regulatory incentives for businesses to locate within these alternative locations.</p> |
| ST1935 | Rachael Milne | | 06 Planning For Jobs | ED02.1 | Objection | <p>QUOTES THROUGHOUT THIS REPORT ARE SHOWN WITH THE SUBSECTION TAKEN FROM AND ARE INCLUDED TO SHOW THE CONTRAST BETWEEN THE REPORT AND THE REALITY.</p> <p>3.2 'This Local Plan key delivery objectives is a clean and Green environment' 'A framework to meet the needs of South Tyneside communities in a positive, managed and sustainable way .' page 10 subsection 1.2.</p> <p>Yet many sites including Wardley colliery ED2.1 Have been proven in the sustainability appraisal of the Draft Local Plan to be unsuitable to build on and completely unsustainable. Table 8.5 shows 10 of the 12 questions delivered a negative or unknown (neutral) on Wardley Colliery site. This site is of important biodiversity importance and it is adjacent to a Local Wildlife Site. To build an industrial site on Wardley Colliery is in direct contradiction to expert opinion on the suitability of this land. To ignore expert reports and recommendations is irresponsible and dangerous.</p> <p>Section 8.8 of the sustainability appraisal states 'Negative and neutral effects have been recorded against objective 7 (sustainable transport) for Land West of Testos roundabout and Wardley Colliery, this is due to the distance the sites are away from existing public transport network and potential impact they could have on the existing highways network. It should also be noted that the Council and the North East combined Authority (NECA) remain supportive of reopening the Leamside Line, which runs adjacent to the Wardley Colliery site.'</p> <p>The old line spoken of is currently a Green transport link as it is a cycle path. Removing the cycle path/bridle way will have a negative effect on sustainability targets and green infrastructure. Wardley Colliery (ED2.1) is not suitable for any kind of industrial development and as the Councils own sustainability appraisal has proven must be protected and removed from the Local Plan. Site ED2.1 Wardley Colliery is not suitable for development as stated in the council's own sustainability appraisal. Hasn't enough damage been done to the delicate ecosystem of Green Belt . Wardley Colliery must be left alone. It is a distance not far from the IAMP 1 and soon IAMP 2. Let us leave the wildlife still clinging on a chance to flourish.</p> |

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| ST193 5 | Rachael Milne | | 06 Planning For Jobs | ED03.1 | | Objectio n | <p>3.7 Table 3.1 Objective 8 states ‘The sustainability question was deleted as new office accommodation in Town Centres is no longer a specific aspiration of the Employment Land Review updated (2018)</p> <ul style="list-style-type: none"> • ED 3.1 (please note 6 sites have this code. One of the sites near the river Don that is joined onto Nissan car storage yard at the Port of Tyne is not suitable for ant kind of development as it is a heavily forested piece of land and we oppose this development) <p>The 5 ED 3.1 economic development areas along the river bank should be reassessed to see if they are suitable for house building.</p> <ul style="list-style-type: none"> • ED3.2 • ED3.3 • ED3.6 <p>THESE SIGHTS ARE ALL ALONG THE River bank. 2 of them are near the pedestrian tunnel and would be good for housing? Please scrutinise these areas for housing instead of economic development. Economic development sites STTAG are objecting to:</p> <p>ED 3.1 (we only object to 1 of the 6 sites given this code. It is the site nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected. It is in very close proximity to the wildlife and protected River Don.</p> <p>ED 3.4 (Trees on this land that have not been afforded protection).</p> <p>ED 3.5 Grass recreation, wildlife.</p> <p>ED 2.1 Wardley Colliery. Not sustainable. (please read whole report for reasons)</p> |
| ST193 5 | Rachael Milne | | 06 Planning For Jobs | ED03.4 | | Objectio n | <p>Economic development sites STTAG are objecting to:</p> <p>ED 3.1 (we only object to 1 of the 6 sites given this code. It is the site nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected. It is in very close proximity to the wildlife and protected River Don.</p> <p>ED 3.4 (Trees on this land that have not been afforded protection).</p> <p>ED 3.5 Grass recreation, wildlife.</p> <p>ED 2.1 Wardley Colliery. Not sustainable. (please read whole report for reasons)</p> |
| ST193 5 | Rachael Milne | | 06 Planning For Jobs | ED03.5 | | Objectio n | <p>Economic development sites STTAG are objecting to:</p> <p>ED 3.1 (we only object to 1 of the 6 sites given this code. It is the site nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected. It is in very close proximity to the wildlife and protected River Don.</p> <p>ED 3.4 (Trees on this land that have not been afforded protection).</p> <p>ED 3.5 Grass recreation, wildlife.</p> <p>ED 2.1 Wardley Colliery. Not sustainable. (please read whole report for reasons)</p> |
| ST193 5 | Rachael Milne | | 06 Planning For Jobs | ED02.0 1 | | Objectio n | <p>Economic development sites STTAG are objecting to:</p> <p>ED 3.1 (we only object to 1 of the 6 sites given this code. It is the site nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected. It is in very close proximity to the wildlife and protected River Don.</p> <p>ED 3.4 (Trees on this land that have not been afforded protection).</p> <p>ED 3.5 Grass recreation, wildlife.</p> <p>ED 2.1 Wardley Colliery. Not sustainable. (please read whole report for reasons)</p> |