

# Green Belt: Exceptional Circumstances (2024)



## CONTENTS

Contents .....	1
1. Introduction .....	2
2. The Council’s Vision for the Borough.....	4
3. Determining the scale of need in South Tyneside .....	8
4. National Planning Context .....	12
5. Determining whether exceptional circumstances exist in South Tyneside .....	22
6. Conclusions .....	24

## 1. INTRODUCTION

1.1 The Green Belt within South Tyneside was established over 50 years ago to help prevent the spread of urban development within the area. The Green Belt forms part of the wider Tyne & Wear Green Belt and remains an important asset to the borough and continues to provide a key role in managing development within South Tyneside and the wider Tyne & Wear conurbation. Within South Tyneside the Green Belt preserves the character and individual identities of the urban fringe villages and prevents their merging with the larger towns of South Shields, Jarrow and Hebburn as well as the neighbouring Local Authorities of Gateshead and Sunderland.

1.2 The development strategies of our previous development plans have sought to follow the principle of protecting the Green Belt and providing for all our development needs within the Borough's urban areas, i.e., the contiguous built-up area of South Shields, Hebburn and Jarrow and to a lesser degree the villages of the Boldons, Whitburn and Cleadon.

1.3 The purpose of this paper is to examine the strategic context and existing evidence base and considers whether exceptional circumstances exist to justify the removal of land from the Green Belt.

### THE GREEN BELT IN SOUTH TYNESIDE

1.4 The Green Belt performs a sub-regional role in preventing conglomeration of the Tyne and Wear conurbation with other outlying areas in the region.

1.5 The Green Belt within the borough was first established in 1965 as part of the Sunderland Periphery Town Map and initially extended along the southern periphery between South Shields and Sunderland and to the west of Sunderland in 1968. In 1978, the Tyne and Wear County Structure Plan set out to further limit urban growth and prevent the coalescence of settlements, particularly the built-up areas of South Tyneside, Washington, Gateshead, and Sunderland. Policies within the Structure Plan proposed various additions, to restrict the further spread of the built-up area and made deletions to allow for housing and economic growth. The Tyne and Wear Green Belt Local Plan was adopted in 1985 in support of the Tyne and Wear County Structure Plan.

1.6 The Local Government Act 1985 introduced the new system of Unitary Development Plans (UDP) to replace the previous two-tier system of 'Structure Plan' and 'Local Plan' which operated in Metropolitan County Council areas. Our UDP (adopted in 1998) set out the requirements for growth, land use allocations, and policies for the improvement and protection of the environment and infrastructure requirements. The UDP also confirmed the extent of South Tyneside's Green Belt. This approach to the Green Belt was carried through into the suite of Development Plan Documents comprising our Local Development Framework (adopted between 2007 and 2012).

1.7 By 2017, Green Belt accounted for 2,408ha (36%) of land within the borough. In late 2017, in partnership with Sunderland City Council, the International Advanced Manufacturing Park (IAMP) Area Action Plan was adopted. Separate evidence of the exceptional circumstances supported the formal deletion of some 150ha of land from the Green Belt which straddles our joint boundary. IAMP will accommodate economic growth in the advanced manufacturing sector. In South Tyneside, the

total Green Belt lost to the IAMP allocation was some 63 ha (equating to a 1% reduction in Green Belt land). South Tyneside's Green Belt now covers an area of 2,345ha (broadly 35% of the borough's total area).

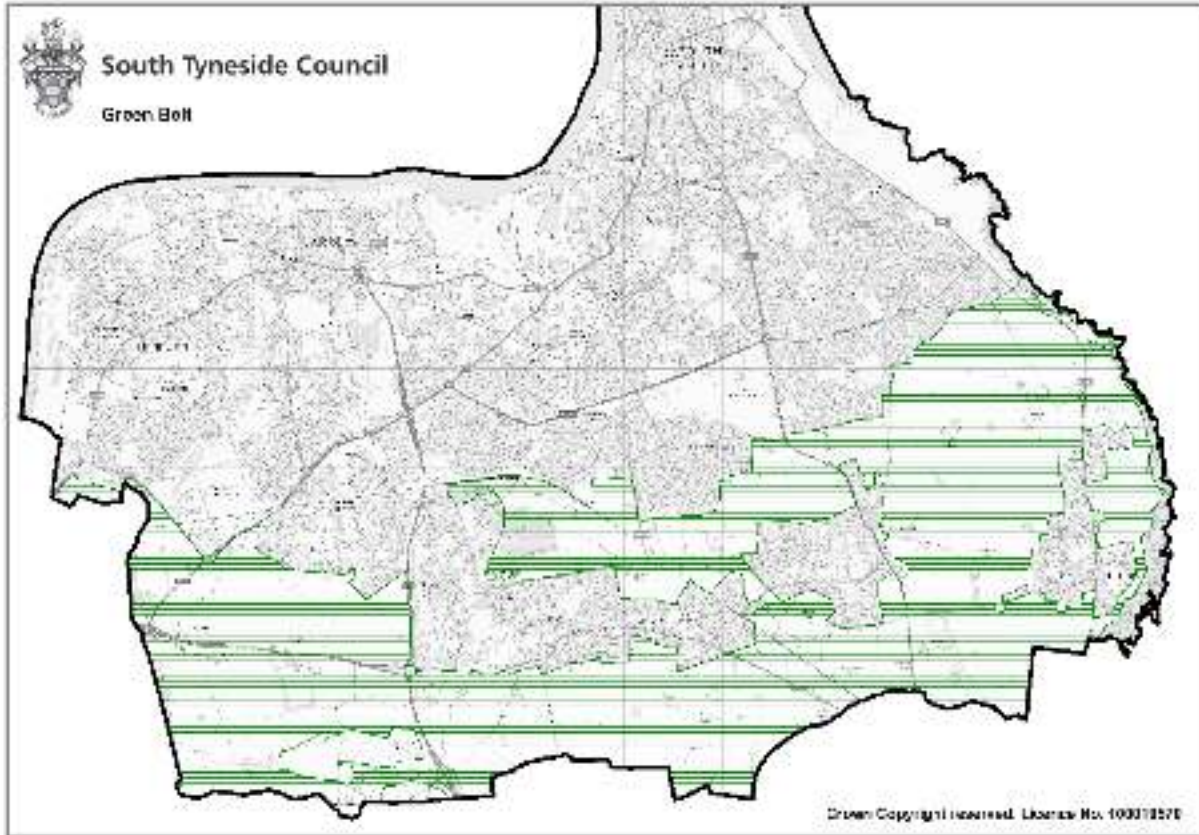


Figure 1: South Tyneside Green Belt

## 2. THE COUNCIL'S VISION FOR THE BOROUGH

2.1 The National Planning Policy Framework (NPPF) states that the planning system has three overarching objectives in delivering sustainable development, and opportunities should be taken to secure net gains across economic, social and environmental objectives.

2.2 The Council considers that meeting the borough's housing needs provides the greatest opportunity to achieve the sustainable development principles set out in the NPPF and also to delivering South Tyneside Council's wider Vision and ambitions for the borough.

2.3 The following section considers the possible implications of not meeting our housing need and how this would restrict the borough and the Local Plan's ability to achieve sustainable development.

### SOUTH TYNESIDE'S POPULATION

2.4 The 2021 Census data records the borough's population at 147,800. This is at least 2.8% lower than the population and household projections using 2014-based and 2018-based projections.

2.5 Table 1 compares the 2018 population projections with the 2021 Census estimates. The columns on the right show the difference and shade each cell from highest (red) to lowest (blue).

Age Cohort	Census Actual	2018-based projection for 2021		
	2021	2021	Difference	% Difference
0-4	7,800	7,979	-179	-2.2%
5-9	8,500	8,932	-432	-4.8%
10-14	8,600	8,724	-124	-1.4%
15-19	7,500	7,888	-388	-4.9%
20-24	7,300	7,597	-297	-3.9%
25-29	8,700	9,511	-811	-8.5%
30-34	9,900	10,125	-225	-2.2%
35-39	9,400	9,360	40	0.4%
40-44	8,500	8,732	-232	-2.7%
45-49	8,700	8,744	-44	-0.5%
50-54	10,400	10,560	-160	-1.5%
55-59	11,200	11,656	-456	-3.9%
60-64	10,500	10,781	-281	-2.6%
65-69	8,800	8,886	-86	-1.0%
70-74	8,400	8,547	-147	-1.7%
75-79	5,600	5,810	-210	-3.6%
80-84	4,300	4,291	9	0.2%
85-89	2,500	2,497	3	0.1%
90+	1,300	1,317	-17	-1.3%
<b>All ages</b>	<b>147,900</b>	<b>151,936</b>	<b>-4,036</b>	<b>-2.7%</b>

Table 1: 2021 Rounded Census Data - Difference from 2018 based projections

2.6 The fourth column shows the highest current *downward* revisions (dark blue shading) almost entirely occur in the under-35 age group. The *upward* revisions (aged 35-39, 80-84 and 85-89) and smaller downward revisions differences are in the over 35 age group and mainly over 65.

2.7 The population changes indicate that South Tyneside is losing its working age population, whilst our older population is increasing. If we do not strive to meet our housing needs, it can be assumed that the trend of losing residents of working-age would continue as there would still be a limited supply of affordable and suitable starter and family accommodation to meet the needs of this age group.

2.8 Given the ageing of the population, the need for specialist older person accommodation is expected to increase. Over the period 2023 to 2040, the number of people aged 65 and over is expected to increase from 32,520 to 40,404, an increase of 24.2% or 7,884 people. Over the period 2023 to 2040 there will be an additional 5,921 households headed by someone aged 65 or over. Many of the older houses within the borough are difficult to adapt and therefore become unsuitable for the ageing population. Given the ageing population, combined with levels of disability amongst the population identified in the Strategic Housing Market Assessment (SHMA), there is a therefore a need for a broader housing offer for, including new homes built to accessibility standards so that residents are not housed in inappropriate housing.

## LAND SUPPLY

2.9 South Tyneside is a relatively compact borough and predominantly urban in character with the built-up area covering about 60% of the land area, constrained by the Tyne and Wear Green Belt. As demonstrated in the Strategic Housing Land Availability Assessment (SHLAA), opportunities for development on brownfield land are limited and there is not a sufficient supply of previously developed land to accommodate our housing needs.

2.10 Up until 2017/18, the borough had a strong record of housing delivery against the Local Development Framework's housing requirement. However, from 2018 onwards, housing delivery has dropped considerably.

2.11 The Council failed the Government's Housing Delivery Test in 2021, delivering just 74% of the housing requirement for the borough. The presumption in favour of sustainable development now applies. This means policies in the adopted Local Development Framework (LDF) are out of date and it could be more difficult for the Council to secure development that is in line with the policies in the LDF such as the Housing Needs, Mix and Affordability policy. The Council is still unable to demonstrate a 5 year supply of deliverable housing land (table 2).

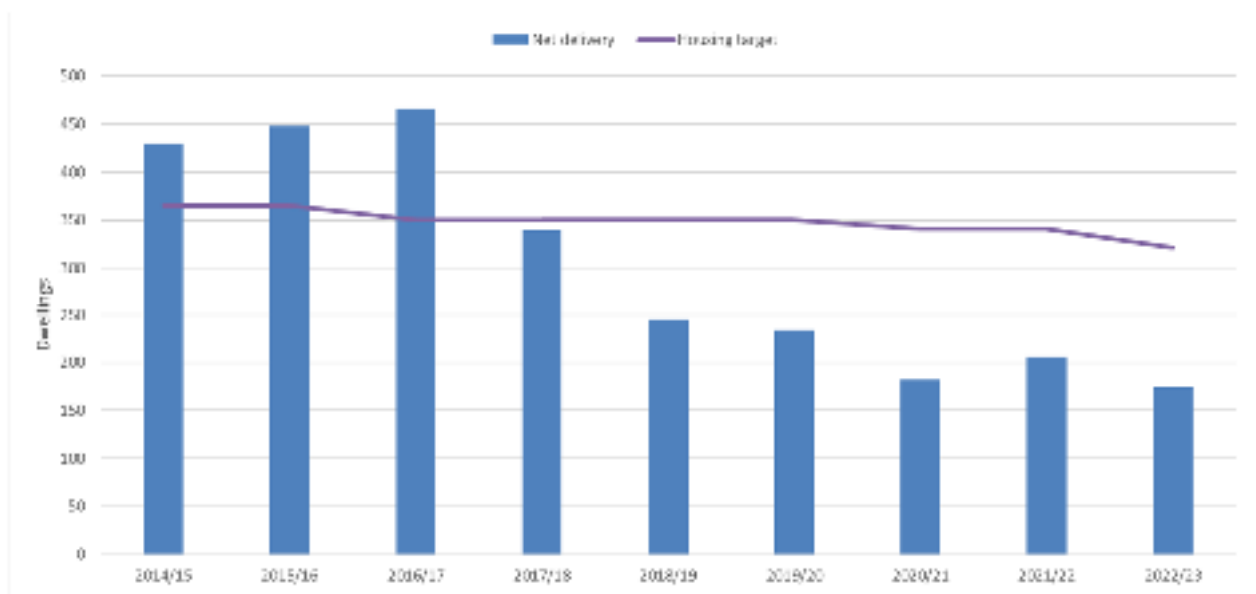


Table 2: Housing Delivery

2.12 The general benefits of delivering new housing can result in:

- Improving the local housing market by replacing obsolescent or unpopular housing and meeting residents' needs better e.g. older persons' rightsizing, young people's first step offer
- A greater variety of different housing tenures and housing options
- 'Churn' in the housing market
- A reduction in the friction within the housing market, e.g. by helping older people to downsize.

2.13 The SHMA reports that house prices and rental prices in South Tyneside are broadly in line with the regional average. An analysis of relative affordability in South Tyneside indicates the challenges faced by residents, particularly those who do not have access to equity or savings.

2.14 Affordable housing is informed by need and is identified in the SHMA which found that there was a need for an additional 361 affordable units per year, including social/affordable units or intermediate tenure. To ensure sufficient quality accommodation is available to meet current and future needs, a supply of good quality, affordable housing is required.

2.15 Affordable housing can be secured through new development by requiring a percentage of that new development to be affordable. Without subsidised new build affordable housing, it will be more difficult to meet residents' housing needs.

2.16 Not meeting our housing needs is likely to continue to restrict the housing market within South Tyneside and push up rental and property prices.

## SOCIAL IMPLICATIONS

2.17 South Tyneside faces significant challenges in terms of deprivation and living standards. The borough was ranked 27th most deprived out of 317 local authorities nationally in the 2019

English Index of Multiple Deprivation. It is more deprived than its Tyne and Wear neighbours and is the 3rd most deprived local authority in the North East region.

2.18 A constrained social housing supply would result in greater numbers of people on the local housing register and longer waiting times for residents needing to find suitable accommodation. Delivering more housing could provide opportunities to deliver a variety of housing types and tenures and this could contribute to reducing housing waiting lists. Furthermore, a lack of housing supply can have implications for homelessness and other statutory Council services as the lack of accommodation increases the challenges around discharging the Council's homelessness duty.

2.19 Not meeting our housing needs could also limit opportunities for those concealed households (where more than one household lives in a property) to obtain their own property. Concealed households may even look to neighbouring authorities to meet their housing requirements. This could be avoided by increasing housing stock in the borough to allow these households to remain in South Tyneside.

2.20 Fuel poverty affects 14.5% of the South Tyneside population. New housing built to a higher energy efficiency standard would reduce fuel costs for residents whilst also contributing to reducing carbon emissions through energy consumption.

## HEALTH IMPLICATIONS

2.21 The health of residents in South Tyneside is generally worse than the regional and national averages with many residents facing health inequalities across the borough. One of the Council's key ambitions is for residents to be:

*'Healthy and Well – Residents will enjoy good mental wellbeing and physical health throughout their lives. They will have the best start in life and be able to live and age well.'*

2.22 The built environment, a large proportion of which is made up of housing and accommodation, is considered to be a key factor in determining the health and wellbeing of residents.

2.23 Inappropriate housing for older people and those with additional needs can result in a greater pressure on health and social services spending, for example, where there is not enough specialist accommodation available. Older people living in larger houses because of a lack of alternative provision can result in them being lonely and isolated and can also result in more trips and slips at home, which can place additional pressure on healthcare services.

2.24 Not delivering new family housing provision can limit opportunities to address health inequalities facing children and young people attributed to poor/ inappropriate housing.

2.25 A lack of affordable homes for key workers, particularly in the health and social care sector, may result in households moving out of the borough. This could have direct implications for health and social care: as the demand for services increases, recruitment is becoming more difficult and without an adequate workforce this could have a negative impact on the health and wellbeing of vulnerable residents.



2.26 By meeting our housing needs there will be greater opportunities to reduce health inequalities in the borough, not only by providing better housing stock, but by utilising developer contributions to contribute to delivering enhancements to open space, green-blue infrastructure, sports provision and health facilities. These wider improvements can benefit the overall health and wellbeing of residents.

## ECONOMIC IMPLICATIONS

2.27 New development can result in a range of economic benefits for the borough, such as increased income for local retail and hospitality businesses, increased council tax revenue for the local authority, and helping to ensure local amenities are fully utilised. It can also contribute to enhancing the borough's attractiveness to inward investors by improving the local availability of skills, boosting economic activity and attracting economic investment and skilled labour.

2.28 Not meeting the housing needs of the borough would restrict these opportunities and would restrict revenues generated from council tax and developer contributions – this would reduce the council's financial capacity to meet the infrastructure needs of existing residents.

2.29 The lack of available or affordable housing would continue to force the working age population out of the borough in order to find suitable and affordable accommodation. This would potentially have economic implications, making it difficult to fill key worker roles in borough due to an increased reliance on travelling into South Tyneside.

## NATURAL ENVIRONMENT IMPLICATIONS

2.30 One would assume that restricting housing development would imply greater benefits for the natural environment due to the reduced need for land-take for development and additional impacts on the natural environment associated with housing development. However, notwithstanding any mitigation requirements needed to address site-specific impacts, carefully planned developments can have wider positive benefits on the natural environment.

2.31 Developer contributions associated with new housing can facilitate improvements to the natural environment through the enhancement or creation of green-blue infrastructure, creation of SuDs basins and landscaping opportunities. The introduction of 10% mandatory Biodiversity Net Gain in January 2024 requires developments to contribute a measurable environmental gain.

2.32 South Tyneside currently has a high proportion of out-commuting, which is predominantly facilitated by private vehicles. Delivering housing and employment opportunities in the borough could help to reduce reliance on commuting and contribute to reducing transport impacts and carbon emissions associated with that travel.

## 3. DETERMINING THE SCALE OF NEED IN SOUTH TYNESIDE

3.1 In accordance with the NPPF and Planning Policy Guidance (PPG), a local housing needs assessment has been carried out using the standard method, which uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. An Employment Land Review (ELR) has also been carried out to assess how much employment floorspace may be required over the Plan period.

## HOUSING NEED

3.2 The assessment and identification of housing land potential in South Tyneside is consistent with the broad methodology identified in the Planning Policy Guidance for Housing and Economic Land Availability Assessment produced by the Department for Levelling Up, Housing and Communities (DLUHC). The most recent SHMA 2023 and objectively assessed needs analysis identifies a housing requirement for South Tyneside of 309 dwellings per annum: a total 5,235 dwellings over the Plan period. The Plan base date is April 2023 for housing completions and commitments (planning permissions).

3.3 Table 2 sets out the calculation used to determine how many houses the Council must plan for across the borough.

		Number of Homes
<b>A</b>	Local Plan minimum housing requirement 2021 to 2039	5,253
<b>B</b>	Completions (net)	0
<b>C</b>	10% lapse rate for commitments of 4 dwellings or less	71
<b>D</b>	Projected demolitions / losses	165
<b>E</b>	Small scale windfalls	444
<b>Residual housing requirement = A – B + C + D - E</b>		<b>5,045</b>

Table 3: Housing Requirement

3.4 This equates to a residual housing requirement target of 5,045. There is a shortfall in supply of at least 2256 dwellings (table 2).

<b>A Residual Requirement</b>	<b>5045</b>
B Developable SHLAA sites	2789
C Supply against target (A-B)	-2256

Table 4 Supply against Target

## EMPLOYMENT LAND REQUIREMENTS

3.5 In accordance with the PPG, the ELR concluded a range of employment growth options for employment needs.

3.6 Five different scenarios were considered, each drawing on a different set of input assumptions. Table 4 shows the net total land requirements for each scenario.

Type of Space/Use Class	Baseline Labour Demand (Pre-Covid)	Baseline Labour Demand (latest data)	Policy-On Labour Demand	309 dwellings per annum (Standard Method)	Past (net) completions
<b>Total</b>	<b>3.37</b>	<b>11.29</b>	<b>27.31</b>	<b>19.50</b>	<b>19.92</b>

Table 5 Total (net) employment land requirements by scenario (2021-2039) (hectares)

3.7 To estimate the overall employment land requirement that should be planned for in allocating sites, it is common practice to add an allowance to the net land requirements as a safety margin. In this instance, the ELR recommends that a two-year safety margin be added. Table 5 shows the requirements by scenario with these adjustments made.

Type of Space/Use Class	Baseline Labour Demand (Pre-Covid)	Baseline Labour Demand (latest data)	Policy-On Labour Demand	309 dwellings per annum (Standard Method)	Past (net) completions
<b>Land Required (net) 2021-2039</b>	3.37	11.29	27.31	19.50	19.92
<b>Indicative Gross Land Requirements by Scenario (safety margin only) (ha) – 2021-2039</b>	9.65	17.57	33.59	25.78	26.20
<b>Indicative Gross Land Requirement by Scenario (safety margin and replacement of losses)</b>	20.22	28.14	44.16	36.35	36.77

Table 6 Indicative gross land requirement by scenario for General Employment Needs (including safety margin and replacement of losses) (Ha) (2021-2039)

3.8 The ELR assessed need over the period 2021-2039. Since the Plan now covers the period 2023-2040, the requirements for each scenario have been adjusted accordingly (Table 6).

Type of Space/Use Class	Baseline Labour Demand (Pre-Covid)	Baseline Labour Demand (latest data)	Policy-On Labour Demand	309 dwellings per annum (Standard Method)	Past (net) completions
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<b>Land Required (net) 2023-2040</b>	3.18	10.66	25.79	18.41	18.81
<b>Indicative Gross Land Requirements by Scenario (safety margin only) (ha)</b>	9.11	16.59	31.72	24.34	24.74
<b>Indicative Gross Land Requirement by Scenario (safety margin and replacement of losses)</b>	19.09	26.57	41.70	34.33	34.72

Table 7 General Employment Requirements adjusted for 2023-2040 with safety margin and replacement of losses allowance added

3.9 The scenario that the Council considers to be the most positive is the Policy-On Labour Demand Scenario. This considers the opportunities that are expected in the wider supply chain as a result of the IAMP. The levels of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. However the ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain.

3.10 An allowance has been added for a safety margin and replacement of losses which has increased the requirement to 41.70 ha.

## 4. NATIONAL PLANNING CONTEXT

4.1 Before concluding exceptional circumstances to justify making changes to the Green Belt, the NPPF at paragraph 146 requires that all other reasonable options for meeting the identified needs for development have been examined fully. Any exceptional circumstances will be assessed through the examination of the Plan and consider whether it:

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

4.2 Paragraph 142 then makes clear that, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or well-served by public transport. They should “set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

### SITE SELECTION

4.3 Throughout the preparation of the Local Plan, the Council has identified and assessed sites to determine if they are suitable for housing or employment. This has included:

- **Call out for housing sites as part of the SHLAA** – The Council has undertaken numerous calls for sites over the years, the most recent in 2021.
- **Employment Land Review** – The ELR was updated in 2023 and together with the Employment Land Technical Paper (2023) assesses and identifies potential sites which could be allocated for employment land.

4.4 The SHLAA and ELR both conclude that there is insufficient land available to meet identified needs. This has led to an assessment as to whether exceptional circumstances exist to amend the Green Belt in South Tyneside.

4.5 Those sites considered to be reasonable options in the SHLAA and the ELR were assessed through the Sustainability Appraisal (SA).

4.6 The Site Selection Topic Paper provides a summary of the examination of all other reasonable options that was carried out in preparation of the Local Plan.

4.7 Figure 2 sets out the methodology used for determining those sites that are considered to be suitable for allocation in the Local Plan.

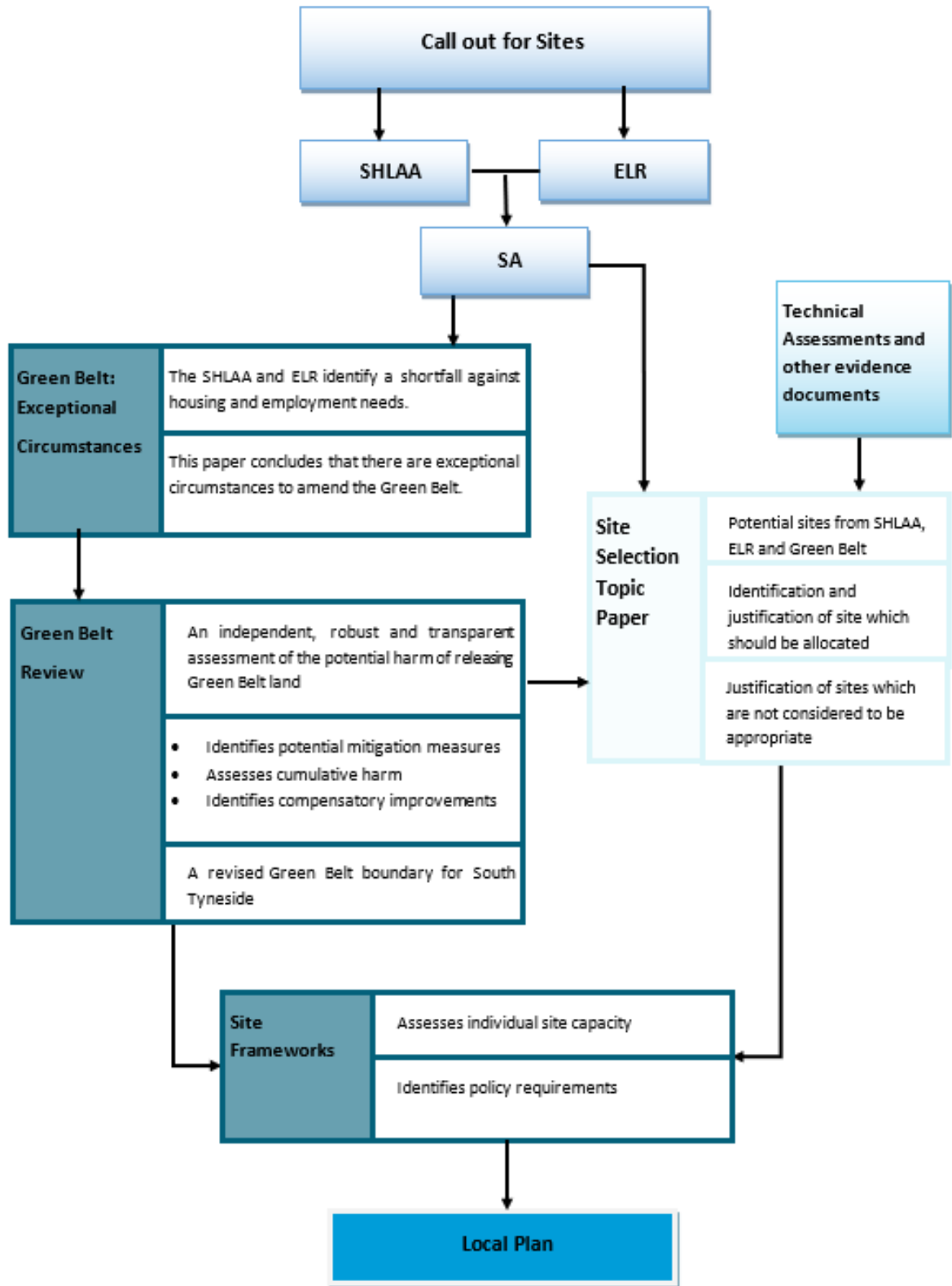


Figure 2: Local Plan Methodology

## CONSTRAINTS

4.8 The Council considers 'absolute' constraints to be those that would prevent development from taking place and where it would not be possible to mitigate impacts. Such constraints would include the following:

- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- RAMSAR sites
- Sites of Special Scientific Interest (SSSI)
- Flood Zone 3
- Scheduled Monuments
- Registered Parks and Gardens
- Cemeteries
- Reservoirs

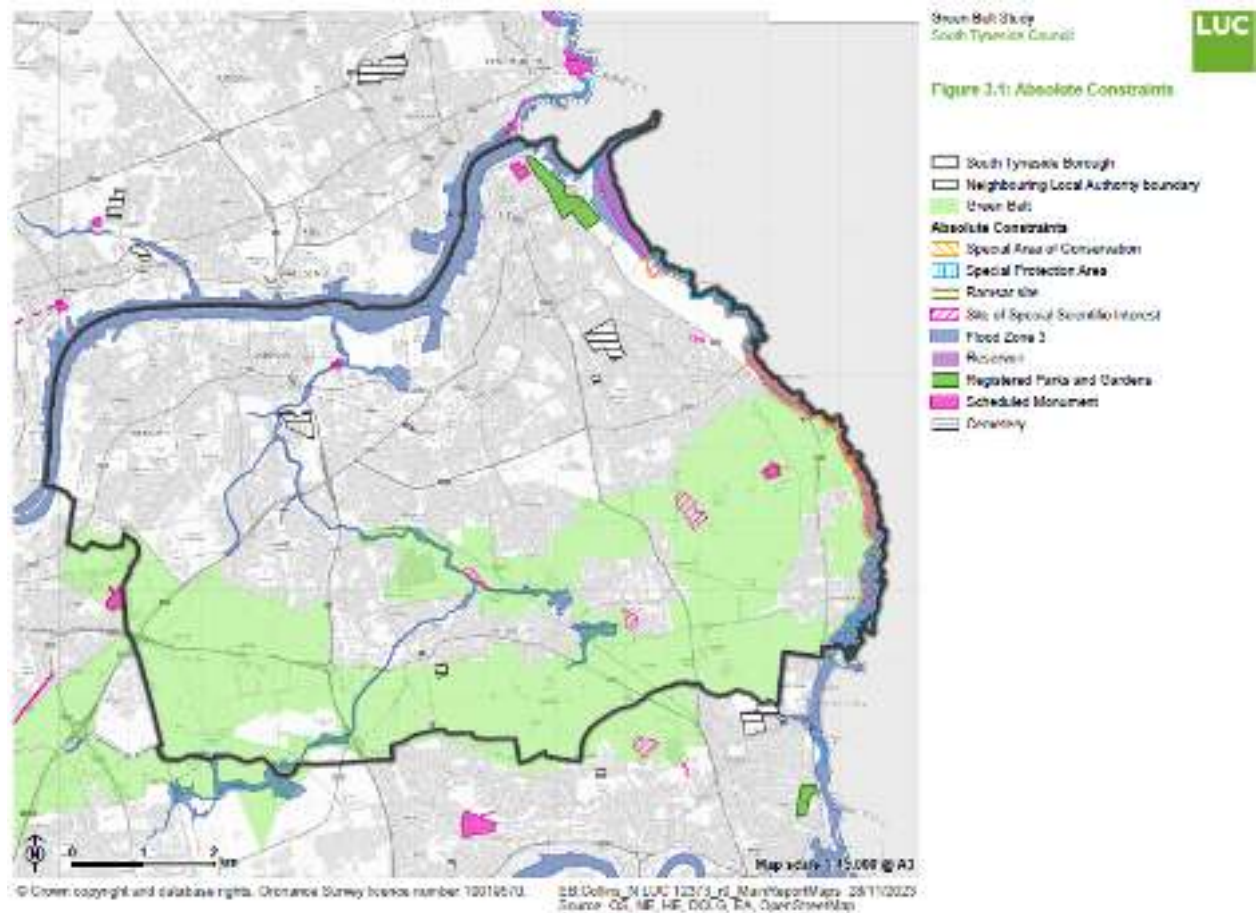


Figure 3: Absolute Constraints (taken from South Tyneside Green Belt Study 2023)

### *Biodiversity Designations*

4.9 The Durham Coast Special Area of Conservation (SAC) protects the only example of vegetated sea cliffs on magnesian limestone exposures in the UK. The Northumbria Coast is classified as a Special Protection Area (SPA) and listed as a Ramsar site for its wading bird species. As Figure 5 illustrates these overlapping areas as they extend along the majority of the borough's coastline. This is our most important ecological designation, and the Appropriate Assessment confirms a 7.2km buffer to where mitigation would need to be provided in perpetuity to mitigate the impacts of recreational disturbances arising from residential development on these coastal designations. In addition, we have 5 Sites of Special Scientific Interest (SSSIs), 52 Local Wildlife Sites and 7 Local Nature Reserves (shown in Figure 6).

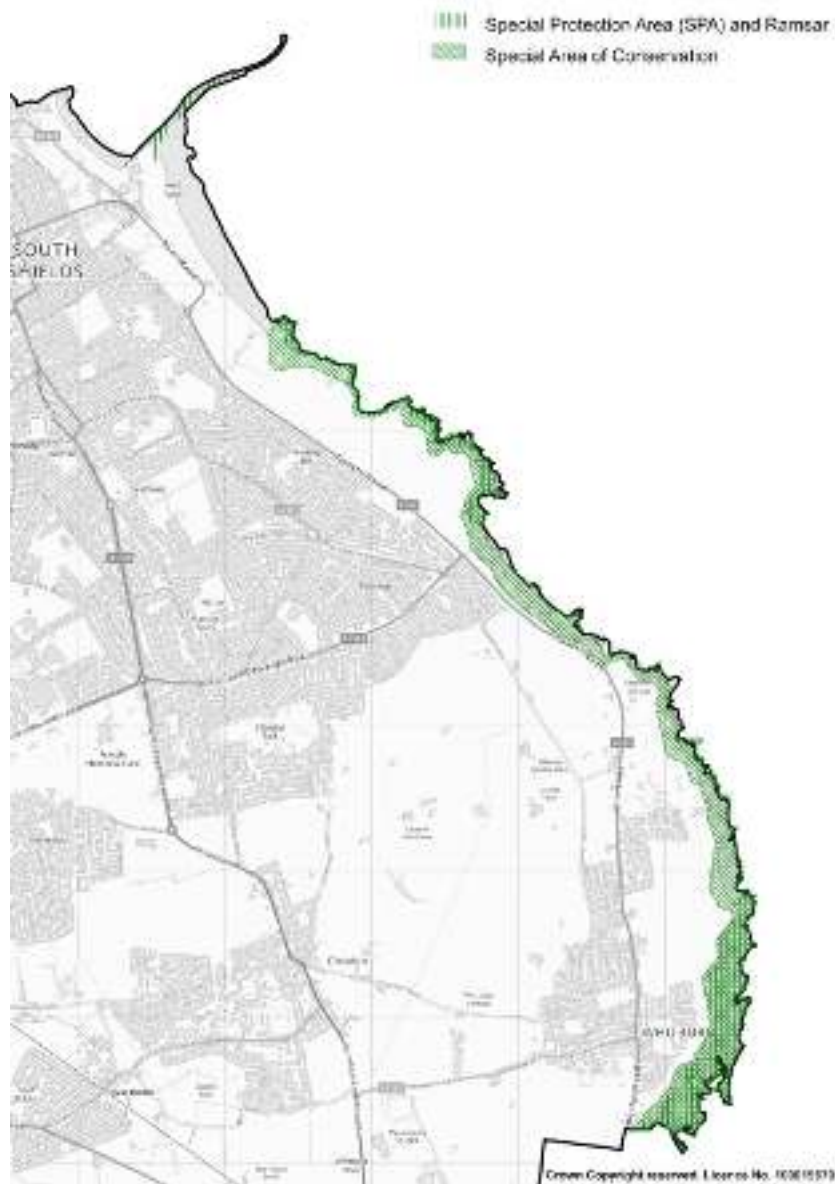


Figure 4: Special Protection Area (SPA) and Ramsar/Special Area of Conservation



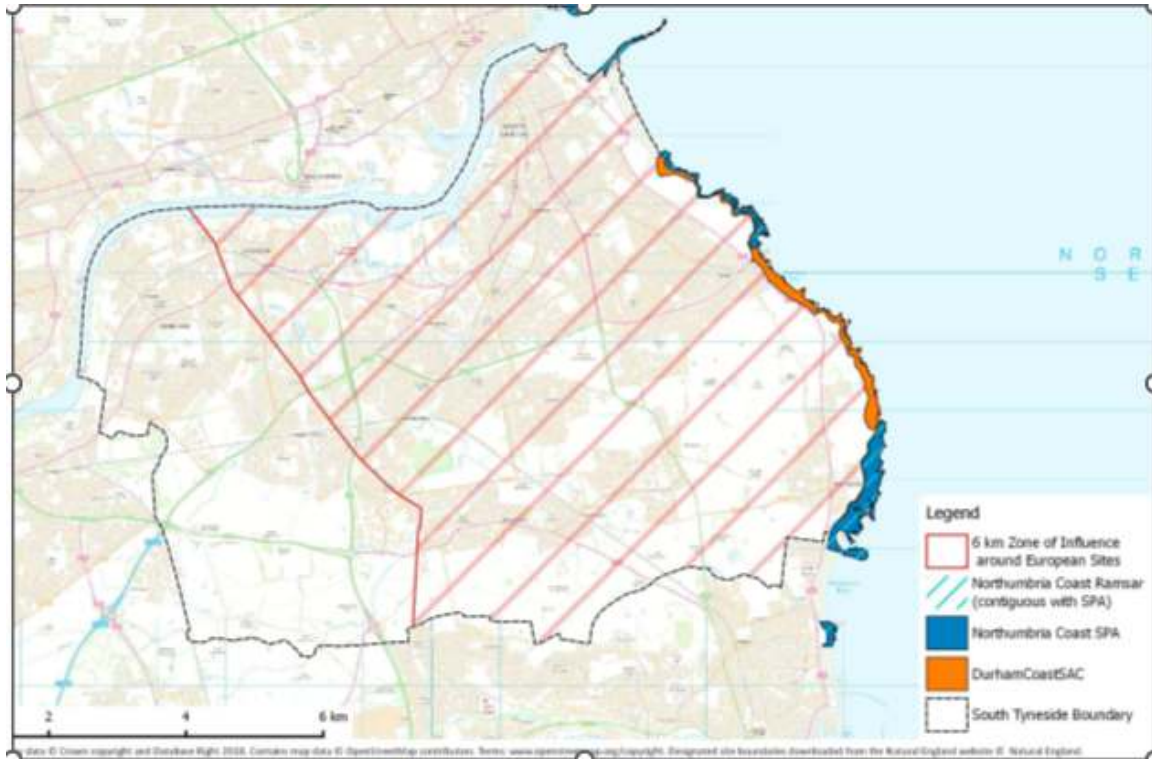


Figure 5: The Durham Coast SAC and Northumbria Coast SPA

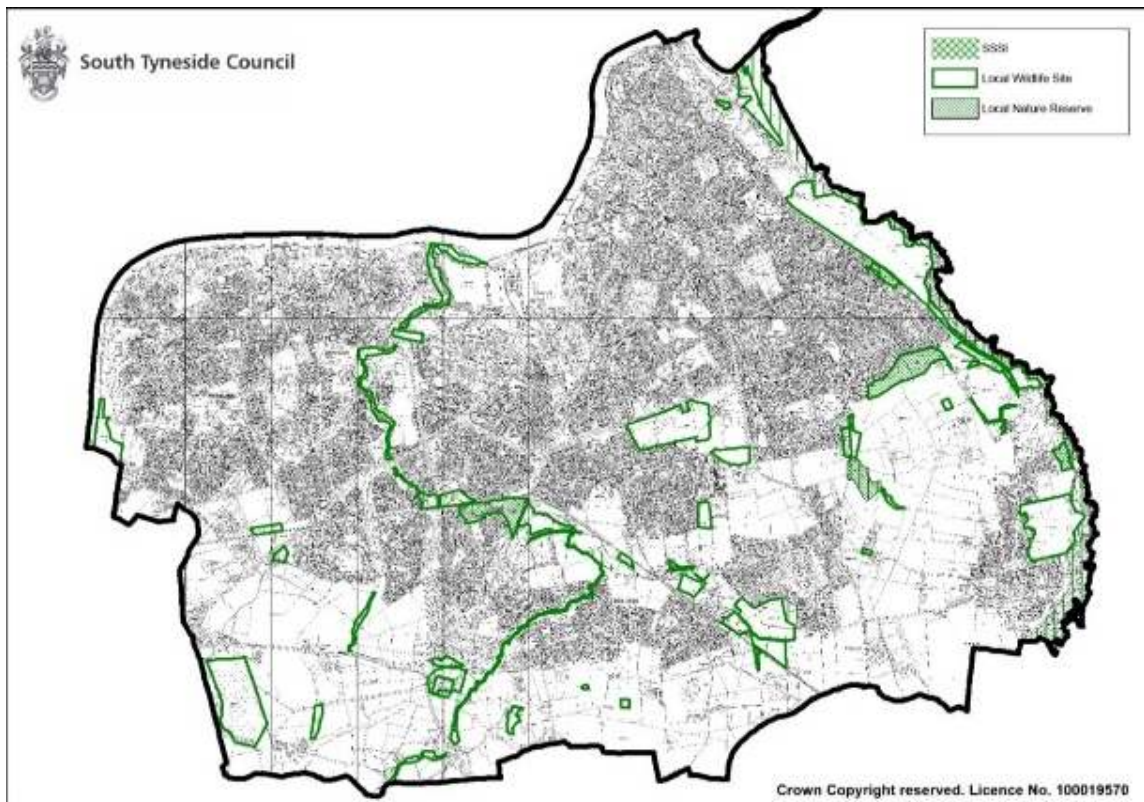


Figure 6: SSSIs, Local Wildlife Sites and Local Nature Reserves

### *Green Belt*

4.10 National policy identifies Green Belt as a constraint. The Green Belt is tightly drawn around the built-up areas of South Shields, Jarrow, Hebburn and villages of the Boldons, Cleadon and Whitburn, extending to the borough's administrative boundaries. Beyond the built-up areas, the Green Belt represents a major constraint on future development unless proposals fall into one of a small number of accepted categories or are justified through a planning application that 'very special circumstances' have been demonstrated.

## THE SUPPLY OF LAND FOR HOMES FROM NON-GREEN BELT SOURCES

4.11 The NPPF requires authorities to demonstrate that all reasonable options for meeting their development requirements have been fully examined prior to amending Green Belt boundaries. This section explores the potential opportunities arising from non-Green Belt sources to meet the residual requirements for new homes.

### **THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA)**

4.12 The primary role of the SHLAA is to identify and assess sites to determine if they have potential to provide for housing in South Tyneside. The SHLAA assesses the potential future supply of deliverable and developable housing land, which is suitable, available, and achievable over a 15-year period. It has helped to inform the emerging Plan to identify the most suitable sites to be allocated within the Plan. The SHLAA methodology is illustrated in figure 5.

4.13 Part 1 of the Brownfield Register (2021) contains some 46 brownfield sites that have been assessed as appropriate that could in theory deliver some 2350 homes. For the purposes of this paper, we have excluded the Brownfield Register as its entries are assessed through the SHLAA. This avoids double counting.

4.14 In total, the SHLAA assesses 174 sites across the borough which currently do not benefit from planning consent for residential development (including land within and out with the Green Belt). 52 specific sites have been identified as deliverable and developable for housing over the remainder of the Plan period with a total combined indicative capacity for 2886 potential homes

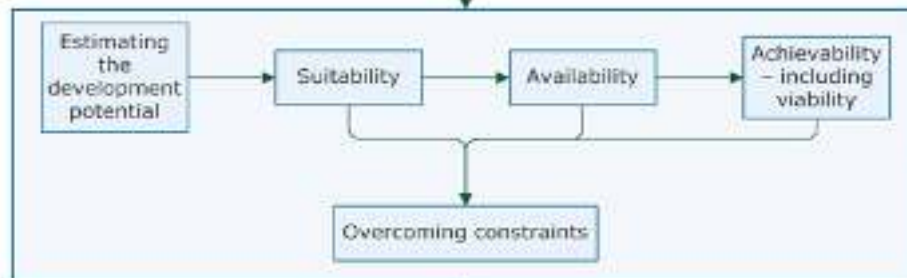
4.15 Taking the above into account, there remains an acute shortfall in the supply of housing land of at least 2159 homes over the Plan period. In other words, the Plan could only meet some around half of its residual housing need which is a significant undersupply against the minimum housing requirement.

4.16 To substantiate the key findings from the SHLAA, a more detailed explanation of how we have used all reasonable endeavours to proactively search for development opportunities from non-Green Belt sources is detailed in the Site Selection Topic Paper.

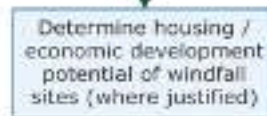
**Stage 1- Site / broad location identification**



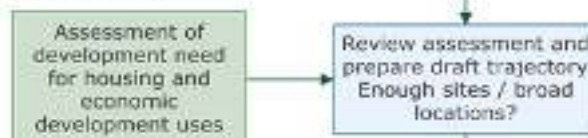
**Stage 2 - Site / broad location assessment**



**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



Figure 5: SHLAA Methodology

## ASSESSING THE SUPPLY OF EMPLOYMENT LAND

4.17 The ELR provides an understanding of the borough’s current position with respect to employment land supply and assesses the anticipated growth trajectory of the borough’s economy and the implications of this with respect to demand for employment land over the period 2021-2039. The Council has updated these forecasts to align with the period now covered by the Local Plan (2023-2040) and these are reflected in the Employment Land Technical Paper.

### *What is the current employment land supply position?*

4.18 The overall available employment land supply is made up of 3 categories:

- General employment land (28.84 ha)
- Specialist – port/river access (25.38 ha)
- Specialist – advanced manufacturing (IAMP) (51.25 ha)

4.19 The supply from the IAMP has not been factored into the ELR. This is because the IAMP has its own adopted development plan document (the cross-boundary IAMP Area Action Plan) and associated evidence base.

### *Removing sites that are not deliverable*

4.20 The ELR considers the deliverability of employment sites in calculating employment land supply. Following this assessment, several sites have been removed from the supply. As a result, the amount of general employment land has decreased to 16.63 ha.

### *The demand / supply balance*

4.21 A very clear message from the ELR is that there is a demand ‘hotspot’ in the southwest of the borough, which has experienced more recent employment-based developments (principally at Boldon and Monkton Business Parks). Demand remains strong as this area is well served by the strategic highway network (i.e. the A19, A184 and A194). The existing supply of employment land is predominantly in the north of the borough, but this is an area of weaker market demand, and the supply is very tight. Our heavier industries are concentrated to the north of the borough within a wide band of estates along the River Tyne corridor.

### *Is there a need to identify additional employment land for development?*

4.22 The ELR assessments have concluded that there is 41.70 ha of existing allocated employment land available for economic development. Table 7 compares the supply of existing allocated employment available land with the forecast land requirements from the policy-on labour demand scenarios.

Scenario option	Policy-on labour demand
<b>Land required</b>	41.70 ha
<b>Existing available supply</b>	42.70 ha
<b>Under or overprovision</b>	+ 1 ha

Table 8 The demand / supply balance with the existing supply of employment sites

### *The quantitative need*

4.23 There is a modest quantitative surplus of employment land in the borough. However, when factoring in the supply of employment land this does not align spatially with market demand. The Council therefore considers that there is a need to identify additional employment land. The ELR identifies several potential new sites. Appendix 3 of the Employment Land Technical Paper sets out how the Council has responded to the recommendations for each of these sites and Appendix 4 sets out other sites that have been considered.

### *The qualitative need*

4.24 The ELR draws attention to the lack of supply relative to demand within the Monkton area. The report concludes that Boldon and Monkton Business Parks are popular estates situated near key junctions and provide modern premises on the edge of the urban area with easy access to the strategic road network. In this area of strong demand, Boldon and Monkton Business Parks are now largely built out for a mix of employment uses, but additional opportunities for development are constrained by Green Belt.

4.25 These findings are consistent with the experience of the Council's Business Investment Team, i.e. there are regular queries for well-located, serviced business space that cannot be met because of the shortage of industrial space in locations where there is market demand. This is acting as a major constraint on growth and investment in South Tyneside.

4.26 The Local Economic Assessment found that there is a severe undersupply of industrial space. If this is not addressed there is a risk that it will increasingly act as a barrier to growth and investment in South Tyneside, including for key sectors such as advanced manufacturing. However, there are no opportunities for identifying land for a new business/industrial park in an area of strong market demand that would not require the alteration of Green Belt boundaries.

4.27 In considering this option the Council has had to balance its economic growth aspirations with the desirability of maintaining the existing Green Belt.

### *Identifying additional land for general employment*

4.28 In reaching the conclusion that there is a shortfall in the supply of land to meet employment needs, the ELR considers opportunities to intensify the employment operations within the existing employment land portfolio. However, a key limiting factor is development viability which is dependent upon a range of factors including:

- Availability and cost of finance
- Abnormal costs of site preparation
- Abnormal infrastructure costs
- Void periods
- Construction costs
- Rental levels
- Yields
- Ability to secure pre-lets or forward sales

- Availability of gap funding.

4.29 The ELR notes that in general terms, South Tyneside is relatively weak in terms of development viability for both offices and wider general employment uses. Rental yields have been suppressed since the economic downturn whilst construction costs have risen. Hence, speculative private sector led schemes generally require public sector financing and support for site preparation works to provide serviced and remediated plots. Given financial constraints, the ability for the local authorities to intervene has and will continue to be increasingly limited.

4.30 Accordingly, it has been concluded that as a potential source, intensifying operations within existing employment areas would not yield any significant opportunities to add to our employment land portfolio.

## **DISCUSSIONS WITH NEIGHBOURING AUTHORITIES**

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4.31 The Duty to Cooperate legally obligates plan making authorities to work constructively and on an ongoing basis with other authorities to identify and, where necessary, address strategic cross boundary issues. As detailed in the Duty to Cooperate Statement that accompanies the Plan, there has and continues to be an ongoing dialogue with our adjoining authorities. This includes matters relating to the overall quantum of growth proposed through their respective local plans and the ability for each authority to be able to meet its own needs.

4.32 In May 2022, approaches were made to Sunderland City Council, North Tyneside Council and Gateshead Council respectively to as to the degree to which each of these authorities would be able to accommodate some of our unmet needs. All three confirmed that they would be unable to meet South Tyneside's housing and employment land needs.

## 5. DETERMINING WHETHER EXCEPTIONAL CIRCUMSTANCES EXIST IN SOUTH TYNESIDE

5.1 Given there is no formal standard definition or a set assessment to define exceptional circumstances, we have been mindful of those ‘tests’ arising from the Calverton Judgement alongside other decisions and NPPF to define the following as the key determining factors within this paper:

- The key constraints affecting growth within the borough
- The scale of need for homes and jobs
- The nature of the supply of land for both homes and jobs from non-green field sources
- The ability of our neighbouring authorities to assist with meeting any of our unmet needs
- Whether we can deliver sustainable development within the borough without impinging on the Green Belt
- The nature and extent of ‘harm’ caused to the Green Belt
- Whether there is scope to reduce or ameliorate the level of harm to the lowest reasonably practical extent.

### ACUTENESS/INTENSITY OF OBJECTIVELY ASSESSED NEED

#### HOUSING NEED

5.2 The housing requirement figure of 309 dwellings per annum has been derived using the standard methodology for calculating housing need. The National Planning Policy Framework (NPPF) expects authorities to follow the standard method in for assessing local housing need. The Planning Practise Guidance (PPG) makes it clear that if it is felt that circumstances warrant an alternative approach to the standard methodology, then authorities can consider this. However, any alternative approach will be scrutinised more closely at examination. There is an expectation that the standard method will be used, and that any other method will be used only in exceptional circumstances.

5.3 The Government sees this figure as a starting point. Local Planning Authorities then undertake an assessment to identify a sufficient supply of land, considering availability, suitability, and likely economic viability, this is undertaken through the preparation of a strategic housing land availability assessment (SHLAA). To establish a housing need for the Local Plan, the Council commissioned the Strategic Housing Market Assessment (SHMA). The SHMA using the standard method calculation identifies a minimum annual need for 309 dwellings. The SHMA carefully reviewed the relevant aspects of the standard method which would warrant an alternative approach to housing numbers to be considered. Based on the demographic information available at the time, the SHMA concluded that no exceptional circumstances were identified. Based on the recommendation of the SHMA, the Local Plan for South Tyneside established a **minimum housing need of 309 per annum**.

5.4 In order to meet the Plan’s residual housing need of 5,045, the Plan is reliant on Green Belt site allocations to meet the shortfall of some 2,256 homes.

5.5 The SHMA suggests that the housing need may be even greater if the need for affordable housing was to be met in full. And whilst the Council considers that its current requirement of 309 dwellings per annum is appropriate, the SHMA recommendations demonstrate the intensity of the need for housing delivery.

5.6 The identified housing requirement, which is acknowledged as a minimum, the continuing failure to deliver enough homes as measured through the Housing Delivery Test, and an identified need for more affordable homes means that the Council is under a great deal of pressure to provide enough land to meet its housing needs.

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#### **EMPLOYMENT LAND NEEDS**

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5.7 The existing supply of employment land is predominantly in the north of the borough. The supply of sites is tight and includes sites that are poor quality and would require considerable investment to make them attractive to occupiers. Consequently, some businesses have relocated outside of the borough and there are indications that this trend may continue.

5.8 The Employment Land Technical Paper recommends that the Council should plan to provide an additional 41.70 hectares of employment land to meet the future employment needs of the borough.

5.9 The ELR identifies a demand 'hotspot' in the southwest of the borough, where businesses would be able to take advantage of the good connections to the strategic road network. The Employment Land Technical Paper has considered the options available to the Council in identifying and increase in employment land to be allocated within the South Tyneside Local Plan. It has concluded that there are no opportunities for identifying new employment land in an area of strong market demand that would not require the alteration of Green Belt boundaries.

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#### **THE DEGREE TO WHICH THE BOROUGH CAN ACCOMMODATE FUTURE GROWTH**

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5.10 This paper has shown that the supply of suitable, available and achievable non-Green Belt land is insufficient to meet identified needs. This is due to a number of factors including the inherent lack of a large supply of brownfield land and other physical and economic constraints such as topography, flood risk, transport infrastructure, landscape and viability. The only alternative is to consider the release of Green Belt land with development potential.



## 6. CONCLUSIONS

6.1 Despite a thorough analysis as required by the NPPF, there remains an acute need for land to meet the needs for new homes and jobs. This is affected by the inherent constraints on the supply from all reasonable non-Green Belt sources to meet those minimum requirements in both the short term and long term. For housing needs, despite those non-Green Belt measures that have been explored, when applied alone or in combination, they still fall a long way short of making up for the scale of under provision against those identified development needs.

6.2 The inability to meet our needs would, in turn, affect the ability of the Plan to deliver sustainable development that supports the Council's Vision, and which has been demonstrated through the Sustainability Appraisal process.

6.3 NPPF stops short of defining which circumstances can be considered exceptional. However, it is widely accepted that exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgement, to say that the circumstances are sufficiently exceptional to warrant altering the green belt boundary.

6.4 The identified housing requirement, which is acknowledged as a minimum, the continuing failure to deliver enough homes as measured through the Housing Delivery Test, and an identified need for more affordable homes means that there is a great deal of pressure to provide enough land to meet the Borough's housing needs.

6.5 The NPPF states that the planning system has three overarching objectives in delivering sustainable development, and opportunities should be taken to secure net gains across economic, social and environmental objectives. This paper has considered the social, economic, environmental and health implications of not meeting our housing need and not releasing land from the Green Belt. The Council considers that meeting the borough's housing needs provides the greatest opportunity to achieve the sustainable development principles set out in the NPPF and also to delivering South Tyneside Council's wider Vision and ambitions for the borough.

6.6 South Tyneside Council has therefore concluded that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough.

6.7 In accordance with the NPPF, the Council acknowledges the need to identify compensatory measures for the remaining Green Belt. Details of this work can be found in the Green Belt Study.

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