National Trust

Design and Access Statement
&
Heritage Statement

To accompany full planning application for the resurfacing of the car park at Souter Lighthouse

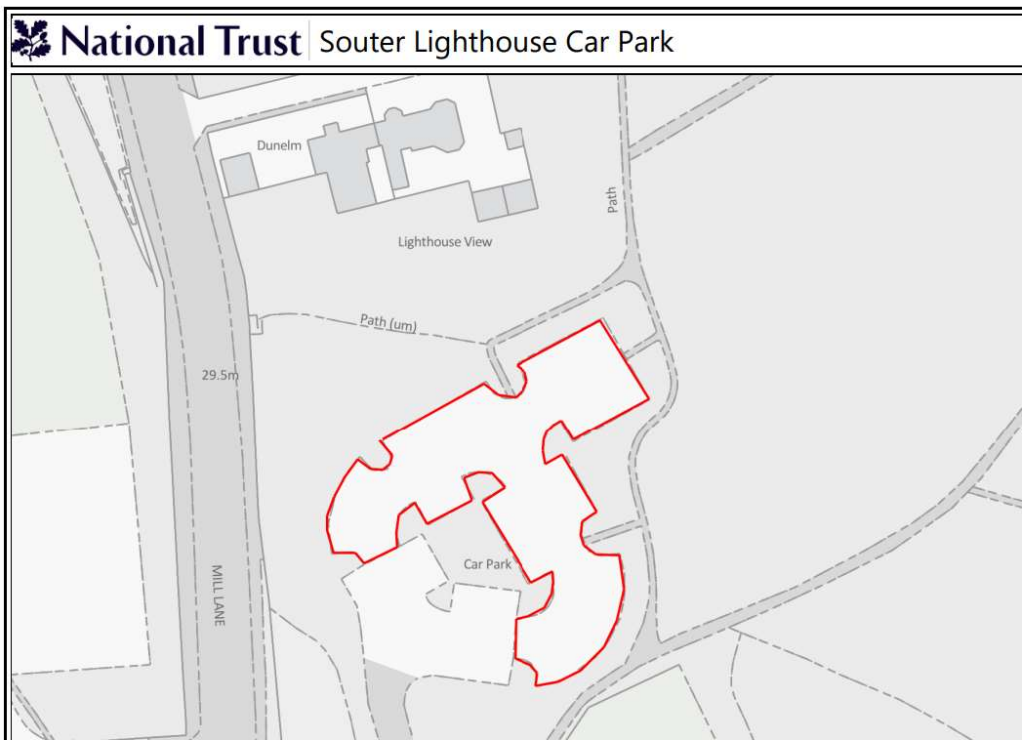
1. Introduction

Souter Lighthouse welcomes around 20,000 visitors per year with a further 50,000 using the car park to spend time in the Whitburn Coastal Park and on The Leas.

The car park was constructed in 1989 with a surface of compacted aggregate and a number of repairs have been carried out over the last 34 years to maintain it as a useable space.

A pre-application was made to South Tyneside Council in December 2022 to enquire whether planning permission was required to resurface a limited section of the car park and didn't include any work to the surrounding paths. It was advised that this proposal was considered development and a full planning application would be required.

The objective of this work is to improve the visitor experience of the existing car park without impacting the existing look or feel of the area. The proposed resurfacing includes spaces for disabled parking. There is no expansion of the existing car park footprint and parking bay numbers remain consistent. The site of the car park proposed for resurfacing is shown on the map below and is included separately within the accompanying plans.



National Trust

2. The Proposal

The current carpark is surfaced in a variety of finishes which include tarmac and loose stone of at least two different colours. The proposal is to lay a new DBM (Dense-graded Bituminous Macadam) surface to match the road which is already properly surfaced and edged.

This application therefore seeks consent for the resurfacing of the car park within its current footprint with a hard surface (details in description below), kerbed perimeter and lined bays. It's proposed to introduce 2 new soakaways into the car park to improve drainage with an existing soakaway being retained.

Detailed plans of the proposed car parking area and drainage works accompany this application.

The following photos show the current car park surface and its condition.



Photo showing hard surface leading to compacted aggregate



Photo showing compacted aggregate surface (area marked in red on plan area)



Photo showing existing hard surface area

National Trust

DETAILED DESCRIPTION OF WORKS:

Kerbing
Form new kerb lines (transition, dropped & half battered) to positions as shown on drawing. Cast new GEN1 found and backing incorporating 12mm MS bar at 450mm centres. (Dimensions as shown on drawings. Allow for a 25mm 3:1 sand/cement bed. Lay new kerb stones 125x255mm and 125x150mm (as indicated).

Surfacing
Lay new road surface comprising of; Tensar Geogrid, followed by 200mm sub-base (Type 1), 60mm DBM road base, 60mm DBM base course and 30mm DBM wearing course. (Construction depth 350mm) Allow for feathering detail at junction with existing retained surface.

DRAINAGE

Soakaway
Lay a Terram Geotextile membrane (T4500) or similar approved within excavated area and backfill using 40mm clean single sized shingle or similar approved material. Lay a 150mm perforated pipe to position as shown. Soakaway No.1 – 6mx6mx1m deep Soakaway No.2 – 3.5mx3.5mx1.5m deep

Catchpit
Cast new base at 225mm depth and surround using 150mm thick grade RC20 sulphate resistant concrete. (Depth to suit soakaway) Form new in/out pipework of; 150mm plain wall allowing for connecting into adjacent soakaway. Build chamber using pre-cast concrete rings incorporating step irons, 100mm deep pre-cast concrete cover slab, grade C250 ductile iron cover and frame with class B engineering brick support. (All in accordance with drawings)

Inspection chamber
Install new polypropylene I/C – 475mm dia (max 1.2m deep) to position as shown. Allow for 225mm deep C20 concrete plinth to support finish with round ductile iron cover and frame over.

Road Gullies
New gully to comprise; Hepworth trapped gully within 150mm grade C20P concrete with 18mm compressible board with class B engineering brick coursing over including D400 hinged gully grate and cover.

Pipework
Flexible bedded; Lay bedding material, as suggested on drawing, followed by a 150mm dia plain wall pipework. Backfill in carefully measure and compacted layers as directed. Concrete Bedded; Allow for 18mm filler boards at 3rd connection cast within RC20P surround as indicated.

Remedial
Carefully reinstate set aside turf to working areas. Compact/work to ensure level with existing retained areas. Allow for 20% new material to ensure complete coverage.

National Trust

3. Heritage Statement

Jonathan Wallis BSc (Hons) MA, NT Cultural Heritage Curator / Mark Newman M.A. M.C.I.f.A FSA, NT Archaeological Consultant (north region east)

The Souter Lighthouse and the Leas Conservation Management Plan (Simpson and Brown for NT, 2019) recommends;

- Provision of suitable car parking in terms of quantity and design - Consider surveillance of the whole site, i.e. carpark to south at some distance from the lighthouse and relatively secluded/ little natural surveillance. Design of car park areas to be designed sensitively in response to their setting and parts of the site they are providing access to. (CMP, summary p. 28)

This present statement should be read in conjunction with the Heritage Statement submitted for the Construction of the Whitburn Coastal Conservation Centre (MNNTR177) which covers research into the evolution and archaeological interest of this area in much more detail.

Significance

Designations

There are no heritage designations in force on the area under consideration for development.

The most significant designation issues concern for the settings of the group of Listed buildings at the lighthouse, and of the Scheduled Monument, Marsden Limekilns. The development site is in proximity and within view of these heritage assets and there is therefore potential for the proposed development to affect their setting. This is considered below.

The potential for the development site to fall within the setting of other heritage assets located further away has been considered, but nothing of this nature has been identified.

Heritage Values

Evidential – *Essentially the archaeological dimension of a heritage asset or location – the way in which is preserves traces of past human activity.*

The archaeological potential of the proposed development site is currently largely untested, although desk-top analysis would suggest that any potential is, at most, extremely limited. The map regression suggests that the site has had relatively little previous disturbance, that it lay on the boundary of the landscape affected by the lighthouse or the outlying social facilities of Marsden village. It appears to have lain just to the north of the quarrying or spoil dumping activities associated with the working life of Marsden Colliery.

Therefore, in theory, there might be some potential for prehistoric, Roman or medieval remains being present, as they have been found to be at other points along the coast. However, in balance to this there is nothing we know of the topography of the site that would lead us to predict such archaeological resources here, nor any circumstances likely to favour archaeological preservation here particularly.

What we can tell about the seemingly low intensity post-medieval land use does not suggest foci for activity likely to give rise to archaeological resources of that later period – other than the potential for remains of the field boundary repeatedly recorded by the OS.

National Trust

The variable whose impacts are more difficult to predict, concerns earth movement towards the end of (and after) the working life of the colliery. Neither do we know precisely what was done – and how – during site reclamation. Burial of old top soils under spoil heaps has the potential to preserve any archaeological record present, but it is not unlikely that the topsoil would have been stripped (removing any archaeological remains) prior to deposition of heap materials.

A watching brief was maintained during groundworks prior to construction of the Whitburn Coastal Conservation centre by Dr. David Cockcroft then of Solstice Heritage for the NT in November 2021. These observed nothing but C20 rubbish and tip waste on the adjacent site down to a depth of 2.7m, where the deposit met bedrock (implying that the suggested topsoil stripping had indeed taken place.

Overall, therefore, one would conclude that the site has a very low level, unproven, archaeological potential. Early stage geotechnical testing on the site would also comment on any such potential.

Historical – *Aspects of a heritage asset or location that either reflect a particular historical process or practice (especially significantly where it was the first place where a practice was developed, for example) {Historical Illustrative] or have a specific association to a historical event or person [Historical Associative].*

A site visit, supported by the historical map regression, suggests that there is little of either form of Historical heritage value present on the development site.

The landscape today is characterised by the car park itself serving the country park (and the Lighthouse), to the east by an open area of short sward grassland, of a similar type to that seen along the coast to the north of the Lighthouse; and to the south by a raised irregular mound with denser vegetation, in front of which now stands the new Whitburn Coastal Conservation Centre.

All of these components (other than the WCCC) appear to result from post-industrial land reclamation for amenity purposes. Aside from representing (minor) elements of an interesting post-WWII story of the reclamation of the coastline as part of rising social aspirations in the local community (enthusiastically supported by Local Government initiatives) the Historical values here seem extremely limited. Any connection with more distant history has been all by expunged by the reclamation. Not that the historical values would appear to have been very notable here even if the changes post-dating 1980 had not taken place. There might be a little residual value in the identification of the land south of the lighthouse as the Welfare Field, recognising the brief period when it was part of the village's sports fields.

The carpark has been used by visitors to the Lighthouse and to the Coastal Park since the early 1990s. Its design is not considered to be significant in any regard and has in any case informally evolved from the form it was given at the time of its initial creation.

As such it may be suggested that there are no notable Historical Values present.

Aesthetic – *Aspects or characteristics of a heritage asset or location which demonstrate either deliberate design for aesthetic effect (effect beyond anything required by the physical operation of the asset) [Designed Aesthetic] or are identified as aesthetically pleasing or*

National Trust

significant even though they have not been deliberately designed to be so [Fortuitous Aesthetic].

There would appear to be little of Aesthetic value present on the development site itself. The situation in its broader setting is a little bit more complicated though. The conversion of the site into a country park was certainly a designed aesthetic activity, with the intention of producing a pleasant recreational space. That said, there is little in the site's treatment that could be described as demonstrating any very significant aspects of landscape design.

As regards the Fortuitous Aesthetic again there is little if anything of note on the development site. It does, though, provide part of the general setting of the Lighthouse, which is considered further below. The car park's present condition is perhaps has a mildly adverse impact on the location's aesthetic, which stands to be ameliorated by the proposed works.

Social/Communal – *Aspects of the heritage asset or location of religious, symbolic or commemorative meaning to a community [Symbolic/Commemorative]; aspects of community social benefit.*

There are no really overt acknowledgements of the symbolic/commemorative value of the site, although it is probably true to say that some is present. Communities' feelings about reclaimed industrial sites vary; for some reclaimed sites are places commemorating loss, reflecting on the industry and the jobs that are no longer present; for some they reflect progress and improvement as the environment is made cleaner and more accessible. For some they can represent a memorialisation of a stage in history with which they have no personal relationship. These patterns will alter from community to community and also over the course of time, as memories fade and personal connections with place diminish.

The specific history of the proposed development site also embodies a chapter of deeper social ownership, at least from the period when the Marsden Sports fields occupied the site. At that time, pleasant things in life were at a premium and some of the better ones existed here.
There is also a clearly recognised social benefit arising from community public ownership of this landscape, and its management by a national Conservation/Access charity.

All of this being acknowledged, the overall significance of these elements of heritage value is probably predominantly **Local.**

Settings –the proposal site lies within or in geographic proximity to a number of other designated heritage assets. Some of these are directly intervisible (indeed conjoining) with the proposed development site, or have other clear interactions that would identify the planned works as being within the setting of those assets (other than in the broadest reading of context), as described in Historic England's guidance GPA3.

Those most closely connected and potentially impacted are –

The Souter Lighthouse complex and the Foghorn - (variously listed Grade II and Grade II*)
Obviously very considerable thought was invested in the design and layout of the lighthouse complex, and it is of considerable historic note that it was the first in the UK (and third in the world) designed to be operated using electricity. However, the design is wholly orientated around providing accommodation and access for staff and equipment within the building, for

the purpose of making the light visible (and foghorn audible) from the sea. The design made no concession to its landscape setting and appears to have made little reference to it.

The key visual qualities of the Lighthouse are its role as notable reference point in the landscape and (from a heritage asset perspective) views towards the building. As regards the former, the proposed development is not assessed as having any impact. The only direction from which it could even theoretically have an impact on the dominance of the lighthouse would be from the south, but the car park is very low lying.

Due to the nature of the enclosing walls of the lighthouse complex and the way it is set in the topography, the carpark is not visible from the north or north-west of the lighthouse, and therefore will not intrude on views of the listed buildings from those directions.

The view of the carpark from the north and east (including the view from the accommodation block of the lighthouse complex) is partially broken or hidden entirely by the existing mounding around the it. The existing surface comprises of a variety of materials with differing colours and finishes which could be said to be visually distracting from the lighthouse and close to the carpark and the new surface will once it has weathered hopefully reduce this impact.

For much of the lighthouse's life the view from it looked out onto a relict quarry, and colliery and a waste tip.

Marsden Lime Kilns (Scheduled Monument)
The lime kilns are a remarkable industrial monument that have recently undergone HLF-funded restoration work. The setting of the monument is presently compromised by ongoing extraction works from the quarry to their west, although this is likely to come to an end in the middle term future.

The proposed works are assessed as having no direct impact on this monument or its setting.

Other possible, possibly affected, heritage assets:

Privately owned buildings north of the car park
The private residence to the north of the car park, but south of the Lighthouse, is a structure of a number of phases, the earliest perhaps the structure shown added to the School complex on the 1912 OS. The building has been much altered since (and has lost its context within the rest of the school complex) and – following assessment – is not considered to be a heritage asset of note requiring further consideration in this heritage statement.

Whitburn Colliery
It has been noted, there is a modest degree of commemoration of the colliery associated with the creation of the country park. The main physical relict surviving are the gate piers – the colliery gate – at the entrance to the country park. The proposed works will not have an impact on these gates, visually or otherwise. They will, though, be taking place within the broader context of the former colliery site, and certainly the area of landscaping associated with its decommissioning.

Significance
The Listed Buildings status of the Lighthouse complex identifies these buildings as being of a recognised **National** level of significance, especially the Grade II* Listed components. Some

aspects of the design and engineering of the lighthouse probably have an international importance, but these are certainly not being affected by the proposed works.

Similarly, Scheduled Monuments are also of **National** significance.

Planning policy protects the setting of designated heritage assets, as well as their physical fabric, although this is less precisely defined.

In other regards the significance of the other heritage values present can probably be assessed as being low, generally of a **Local** significance at most. Were specific archaeological remains from a pre-post-medieval period to be discovered then there is potential for them to be of a greater significance, but at present there is only a very low potential for such remains to be present.

It is a little challenging to determine the precise significance of the most recent "layer" of the landscape history, the remediation of the industrial landscape and creation of the country park. This is undoubtedly of social and environmental benefit; but perhaps it is too recent (and of too modest a design quality) to merit a specific heritage significance at present. It is, though, an important social milestone in our approach to environmental management which might come to be seen to have a significance of its own at some point.

Impacts
The proposed development is assessed as having the following impacts on the site:

- Excavation for the removal of existing carpark surfacing and forming the new car park surface.
- Excavation for drainage works.
- Installation of new carpark surface and edgings.

Effects on Evidential Value
The overall dimensions and layout of the carpark will not be altered by this development, and analysis would suggest very limited impact on even the very low potential for Evidential value present.

Only the drainage excavation works have the potential to impact any archaeological remains, should any be present.

Overall the potential for archaeological remains to be present is very low. There is some ambiguity surrounding the extent and nature of the mining legacy and its remediation. The OS mapping suggests that the site was not directly affected during the C19-20 industrial phase, and that the landscaping mounds solely relate to the 1980s site restoration. Other inspections /boreholes nearby suggest a more complicated story, potentially with the site being excavated and refilled. If the car park site has been so excavated then there is no potential for significant archaeological remains surviving, and the planned works will therefore have not impact on evidential value.

Effects on Historical Value
The proposed works will little alter the current use of the landscape and will secure continued safe use of the carpark, which has been used for at least 30 years, into the future.

There are few if any historical values present on the site itself, other than conversion of industrial land to amenity use. As the planned development will enhance amenity use of the coast, it could peripherally be seen as an enhancement of this value – although not focussed on heritage values.

Effects on Aesthetic value
The proposed works will alter a feature already in the landscape, visible in some minor views of the Listed Lighthouse complex, and but not from a Scheduled Monument.

The proposed work could be seen to have a minor positive impact on the aesthetic value of the site. There will be an impact on views from parts of the lighthouse, but analysis suggests that these will not be significant.

Effects on Communal value
The provision of a more accessible carpark can be argued to be an additional public benefit arising from the use of the site. This again, though, is not specifically relating to a heritage values led definition of public benefit.

If the site is seen as having a symbolic/commemorative value relating to the loss of Whitburn Colliery, then the proposed works stand to change the present landscape, though it is doubtful that this would be considered to be in significant, let alone negative, way. However, this is really a matter for the local community to comment on.

Mitigation
The use of materials used elsewhere is seen to mitigate slightly the impact of the existing carpark.

Overall Assessment of Impact
In light of the assessments made above, it is the view of the National Trust that the proposals are appropriate to this setting, proportionate and overall will have negligably beneficial effect on the heritage values of the site. Its overall heritage significance – which is not high - will remain largely unaltered.

It is the National Trust's assessment (in response to the test contained in NPPF paragraph 196) that no element of the proposed development constitutes Substantial harm to a recognised heritage asset.

There is some residual potential for limited harm to any pre-1700 archaeological resource present, but the potential for this is almost certainly low. Such impacts would arise from the drainage works proposed.

The works will have an effect on the aesthetics of the immediate landscape. These have been carefully designed to be recessive and not to intrude on more significant views into and out of nearby heritage assets. There will certainly be some degree of change, but our assessment is that this will not be harmful.

Therefore the National Trust maintains that the proposal is consistent with the organisation's published Conservation Principles, and the Conservation Management Plan for Souter Lighthouse. The National Trust therefore feels confident that it is an appropriate proposal to make for the site.

National Trust

Bibliography

Newman, M., 2019, Construction of the Whitburn Coastal Centre, Heritage Statement. National Trust Archive Report MNNTYR177 (ST/085619/FUL)
Uglow, N., 2020,Conservation Management Plan for Souter Lighthouse. Simpson and Brown for NT.

4. Ecology [*Stephen Morley NT Nature Conservation Adviser]*

The statement that follows addresses ecological issues with respect to a proposed resurfacing of the car park at Souter Lighthouse. 2023. The briefness of the statement reflects the low ecological impact of the project.

Proposed work

The work proposed is to scrape and level the current car park surface, with new tarmac placed on top, using the same footprint. All work will be within the existing car park footprint, there will be no removal of any grassed or other adjacent vegetated areas. Two new soakaways are proposed in addition to 1 existing, 3 total.

Existing habitats and species.

The existing habitats that will be impacted are the current hard-core car park surface. It is considered that there is no ecological value to the current car park surface, and therefore no habitats of any significance will be lost. Adjacent habitats include both improved amenity (improved) and species-rich neutral grassland. No adjacent habitats will be lost or impacted as work will be restricted to the existing footprint. There are no large trees or similar adjacent to the car park which will be impacted by works adjacent. Similarly, impact on any species of note is likely to be negligible, and limited to any species which happen to be crossing the site.

Proposed mitigation

No mitigation is proposed for existing habitats or species.

Conclusion

Is considered that the nature of the project is such that no habitats or species of note are likely to be adversely affected by the works, provided that work is undertaken as described in the existing car park footprint only, and therefore no specific ecological mitigation is highlighted or proposed.

5. Relevant Planning Law Policy and Guidance

Designations

The site lies within the following designations identified in the Local Development Plan Framework for South Tyneside;

- Green Belt and Great North Forest Area
- Strategic Recreational Open Spaces and Playing Fields
- Undeveloped Coast
- Wildlife Corridor

In the vicinity of the application site the Durham coast is designated as a European Special Area of Conservation [SAC] together with the Northumbria Coast European Special Protection Area [SPA] an international RAMSAR site and SSSI. However, given the very small extent of

the works consisting of the resurfacing of the existing car park within its existing footprint, no wider impact on these designations is expected to arise.

Planning history

Planning permission and listed building consent was granted in January 1990 for the change of use from lighthouse and associated buildings and internal / external alterations to provide visitors centre, staff accommodation and 1 no. holiday cottage (Ref: ST/0897/89//DM & ST/1079/89//LB).

The installation of 2 no. pay and display car park machines at Souter Lighthouse Car Park and Whitburn Coastal Car Park was granted consent in February 2016 (Ref: ST/1183/15/FUL).

On land adjacent to the car park, planning permission was granted for the construction of the Whitburn Coastal Conservation Centre in 2020 and more recently for the installation of services (Ref: ST/0856/19/FUL & ST/0595/22/FUL). This development is nearing completion.

The WCCC planning conditions discharge (ref ST/0250/23/COND) confirms the location of cycle parking within the existing car park which is to be implemented as part of the development.

There are no further applications of relevance.

Planning and Related Policy Framework

Planning applications must be determined in accordance with the Statutory Development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act and section 70(2) of the Town and Country Planning Act 1990).

In this case, the Statutory Development Plan for South Tyneside comprises a suite of documents making up the Local Development Framework. This includes the South Tyneside Core strategy adopted June 2007 and key diagram, Development Management policies adopted 2011 and Site-specific allocations document 2012 and proposals map.

Material considerations in this proposal comprise the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) together with any relevant Supplementary Planning Documents.

The application site also lies within the designated area of the Whitburn Neighbourhood Plan 2021 – 2036 (Adopted September 2022).

The Council is currently preparing a new Local Plan for South Tyneside and the most recent consultation on the draft local plan took place in June 2022. The Council is aiming to undertake further consultation in 2023. At this stage it is not possible to accord weight to the policies of this emerging Plan. Policies of the extant Development Plan will only carry weight where they remain consistent with the NPPF.

The key elements of national and local planning policy therefore relating to this proposal are set out below.

<u>National Planning Policy Framework (NPPF)</u>

The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF which was revised in July 2021 states that there are three overarching objectives for the planning system. These are interdependent and need to be pursued in mutually supportive ways; an economic objective, a social objective and an

National Trust

environmental objective. At the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

Section 13 of the NPPF relates to protecting Green Belt land. Paragraph 137 of the NPPF states that the Government attaches great importance to Green Belts. The fundamental aim being to prevent urban sprawl by keeping land permanently open and recognising that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 147 advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 149 explains that the construction of new buildings within the green belt are inappropriate unless certain exceptions apply. Point b provides for *"the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it."*

As the proposal relates to the resurfacing of the existing car park at Souter Lighthouse and is part of the wider Whitburn Country Park it provides facilities for outdoor recreation.

It is therefore considered that the resurfacing of the existing car park constitutes the provision of appropriate facilities for outdoor sport and recreation and as such does not constitute inappropriate development.

The proposal is an engineering operation which relates to the existing car park and does not extend beyond the current car park footprint. It only relates to resurfacing and therefore continues to preserve the openness of the Green Belt and does not conflict with the purposes of including land within it.

Section 15 of the NPPF relates to conserving and enhancing the natural environment. Paragraph 180 of the NPPF requires local planning authorities to apply various principles when determining planning applications. Point a) of the paragraph states that "*if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."*

The wider site is recognised as a sensitive site in terms of the natural environment with various designations including wildlife corridor, however as the proposal relates to the resurfacing of the existing car park, it is not considered that it will have a detrimental impact on the natural environment. The Ecology Statement above confirms no habitats will be impacted by the proposal.

Section 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraphs 194 – 208 of the NPPF relate to considering potential impacts of a proposed development on heritage assets.

In determining applications, the NPPF (para 194) requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be *'proportionate'* to the assets' importance.

The impact of a proposed development on the significance of designated heritage assets is to be considered in line with the advice contained within paragraphs 199 - 208 of the NPPF. This reinforces that '*great weight'* should be given to the asset's conservation. The more important

the asset '*the greater the weight should be'*. Paragraph 200 also confirms that significance can be harmed or lost from development '*within its setting'.*

The impacts of this proposal on the heritage assets including the Grade II* listed building of Souter Point Lighthouse and attached buildings and surrounding Grade II listed walls are set out in the heritage section above.

As set out within the HIA, it is the view of the National Trust that the proposals are appropriate to this setting, proportionate and overall will have negligably beneficial effect on the heritage values of the site. Its overall heritage significance – which is not high - will remain largely unaltered.

It is the National Trust's assessment (in response to the test contained in NPPF paragraph 196) that no element of the proposed development constitutes Substantial harm to a recognised heritage asset.

There is some residual potential for limited harm to any pre-1700 archaeological resource present, but the potential for this is almost certainly low. Such impacts would arise from the drainage works proposed.

The works will have an effect on the aesthetics of the immediate landscape. These have been carefully designed to be recessive and not to intrude on more significant views into and out of nearby heritage assets. There will certainly be some degree of change, but our assessment is that this will not be harmful.

South Tyneside Policy Framework

The Core Strategy ST1 Spatial Strategy for South Tyneside (LDF Core Strategy) – sets out the spatial strategy for the development of South Tyneside.

Policy EA1 (LDF Core Strategy) promotes local character and distinctiveness. This policy seeks to conserve the best qualities of the natural and built environment including ; b) protect and enhance the openness of the green belt and c) preserve the special and separate characters of the urban fringe of villages around Boldon and Whitburn.

The proposal continues to protect the openness of the green belt.

Policy EA2 (LDF Core Strategy) seeks to reinforce the coastal zone as a strategic multi-purpose corridor where it states the Council will work with partners to conserve and enhance the character of the undeveloped coast as a high-quality natural environment and resource for bio diversity and outdoor recreation.

The proposal has no impact on the undeveloped coast in South Tyneside. The proposed work is intended to improve the visitor experience of the existing car park in order to better facilitate outdoor recreation associated with the wider site.

LDF Core Strategy Policy EA3 protects biodiversity of this important stretch of coastline and the Plan highlights that essential to ensure that tourist and recreational activities do not undermine or threaten the outstanding natural qualities of this area. Again, the proposal will not undermine or threaten the natural qualities of the area.

Policy DM1 [LDF Development Management Policies] is a general criteria based policy against which all applications will be assessed; Criteria a) design sensitive to its surroundings and c) protecting landscaping have been considered as part of the proposal.

DM6 Heritage Assets and Archaeology (LDF Development Management Policies) - relates to the protection, preservation and enhancement of the Borough's heritage assets and their settings. It is considered that the proposal complies with this policy and is discussed in further detail in the HIA.

Policy DM7 Biodiversity and Geodiversity Sites seeks the protection and enhance the important environmental assets of the borough.

The LDF Site Allocations document contains a number of specific policies that are broadly relevant to this proposal;

Policy SA6 promotes and encourage proposals that broaden the range of indoor sports and leisure facilities, and other social and community facilities, to serve local needs.

Policy SA7 supports the improvement of the quality of the public realm and the provision of publicly accessible recreational open spaces throughout South Tyneside including ' *enhancing the parks and open spaces'*. The proposal supports the enhancement of the Whitburn Coastal park as a destination for recreation and interaction with the coast, criteria I) states

I) supporting proposals for other outdoor sport, recreation and leisure uses and ancillary development associated with the River Tyne and coastal and Great North Forest areas, where they do not compromise the safety and operation of commercial river-related uses or other recreational pursuits, or adversely impact on the natural and built assets of the area, particularly the integrity of the European interest species found at designated sites.

Whitburn Neighbourhood Plan 2021 – 2036

Policy WNP6 (Green Infrastructure Enhancement and Connectivity) states that development proposals which restore, maintain and enhance the connectivity and biodiversity value, landscape value and where relevant, recreational value of the areas of local green infrastructure will be supported. It is considered that the proposal is consistent with this policy.

Policy WNP7 (Local Landscapes and Seascapes) states that development proposals should include consideration to the impact of the development on the character of the local landscape with a locally important landscape being recognised as Whitburn Coast including Whitburn Coastal Park. The proposal has considered the character of the local landscape and we consider that it will have a positive impact on the local character.

Conclusion

The planning application seeks consent for the resurfacing of the car park at the National Trust property known as Souter Lighthouse. It has been demonstrated that the development is consistent with national and local planning policy and will add to the overall visitor experience of the property.

The scale and extent of the proposal has been kept to a minimum, carefully balancing the needs and expectations of visitors with the need to conserve and enhance the natural and historic environment. It is considered entirely consistent with national and local policy and the proposal will continue to support the visitor experience of the site and surrounding area. Accordingly, it is requested that planning permission is granted.