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Helen Lynch
Senior Planning Officer
South Tyneside Council
Town Hall and Civic Offices
Westoe Road
South Shields
NE33 2RL

Our ref: SM/22-02216
Your ref: ST/0140/24/FUL
Date: 20 July 2026

Dear Helen,

Re: Moor Lane Service Station, 8-10 Moor Lane, South Shields, NE34 6BZ – Submission of Revised Information

This Covering Letter outlines the revised information submitted to South Tyneside Council, pursuant to Planning Application Ref. ST/0140/24/FUL.

On 19 March 2026 and 20 March 2026, the application Case Officer Helen Lynch provided the consultee comments and representations received with respect to the application further to the amended / additional information submitted to date.

To address these consultee comments, the following information has been provided:

- Proposed Layout, drawing no. 230860-04 (K);
- Condition Survey Report, prepared by Rapleys LLP; and
- Flood Risk Statement and Drainage Strategy, prepared by Cora IHT, ref. 16-2193, T001 Issue 3.

It is considered that this information addresses all outstanding matters on the application and that it can now be positively determined.

A summary of the updated information has been set out below.

Site Plan

The site plan contained within the Transport Note, dated 17 December 2025, is correct, with the overall site plan updated to match this access arrangement (Proposed Layout, drawing no. 230860-04 (K)).

As such, the highways department has assessed the correct site plan.

Environment Agency

On 24 February 2026, the Environment Agency (EA) advised that they had reviewed the information submitted and wishes to withdraw its groundwater objection.

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The EA continues to state they have no objections to the proposal as submitted and consider the proposed development is acceptable providing 1no. pre-commencement condition pertaining to the underground tank is imposed.

Please take this as confirmation from our client that they can agree to this condition.

Flood Risk and Drainage

On 12 March 2026, the South Tyneside Lead Local Flood Authority (LLFA) confirmed they continue to have concerns regarding spillages on site and the potential impact on water quality.

The LLFA asked for confirmation of the presence of an oil separator on site to ensure water quality is protected in the event of a spill.

An updated Flood Risk Statement and Drainage Strategy Report (ref. 16-2193, T001 Issue 3) has been prepared by Cora IHT.

This report confirms the location of the existing fuel interceptor at the site. This confirms the presence of an oil separator, which ensures water quality is protected in the event of a spill. As such, this updated document should be sufficient to overcome the concerns raised by the LLFA.

Highways

The Highways Authority has requested a S106/UU to fund Traffic Regulation Orders for parking and loading restrictions on Moor Lane, in addition to a S278 agreement in respect of highway works. Both are considered acceptable and are agreed by the applicant.

Furthermore, the Highways Authority has requested conditions relating a Demolition & Construction Method Statement, Required Highway Works, Surface Water Drainage (Private Land to Highway), Car Parking, Cycle Parking and Refuse. These conditions are considered acceptable and are agreed by the applicant.

Design and Heritage

On 11 March 2026, the Council's Historic Environment Officer acknowledged additional details, including a revised Archaeological Desk Based Assessment, had been submitted, noting proposed mitigation measures which would be implemented following the application's approval.

The Historic Environment Officer refers to Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Historic Assets, and states that the proposal is not acceptable in its design and they do not support the loss of the existing building. They therefore conclude that they are unable to support the application in its current form.

The Officer suggests that any amendments to the design should consider the introduction of a vertical emphasis, a stronger visual rhythm, a variety of interesting textures and materials, and adding depth and dimension (helping to bring flat surfaces to life).

To assist the Council with its determination of the application, a Condition Survey has been prepared by Rapleys' Building Consultancy team, dated May 2026.

The report sets out the condition of the existing building and its state of repair. It also includes costs associated with bringing the property back into a good state of repair, suitable for operation as a

petrol station. The report has also assessed the reinstatement of residential accommodation at first floor level.

The condition survey report concludes that the property is in poor condition currently with an accumulation of defects and issues that require rectification to return the property to a good standard of repair. It states that these works are needed to allow for the building's continued occupation as a petrol station kiosk building with residential accommodation at first floor level.

The costs associated with bringing the building back into a good state of repair to ensure that it can be actively used are concluded to be £377,500 (excluding VAT).

This level of cost would vastly exceed any return on the sale or rental of the first floor residential unit.

Rapleys has undertaken a review of property sold prices within the NE34 postcode area using Zoopla (Zoopla.co.uk). This review has found that a total of 49 flats have been sold within the NE34 postcode over the past 12 months. The average sale price for a flat was £90,352. The property sold prices ranged from £39,999 to £145,000. The upper quartile sold price for the 49 properties is £105,000.

Rapleys has also undertaken a review of flats in the NE34 postcode which have been advertised for let over the past 12 months. This identified 13 flats. The average advertised rental price for these properties was £604.62 pcm or £7,255 per annum. The prices ranged from £475 pcm to £725 pcm. The upper quartile rental price for the 13 properties was £665 pcm, which equates to £7,980 per annum.

Based on the findings set out above, it is unreasonable to expect the applicant to invest £377,500 into a property which would only generate around £105,000, if the residential apartment was sold, or £7,980 per annum rent, if the apartment was let.

If the apartment was sold, this would result in a loss of £272,500. If the apartment was let, this would result in a gross yield of just 2.11%. Any associated lettings charges, management fees, repairs and maintenance costs, insurance costs, safety compliance costs, mortgage / interest payments, tax, and other costs would be deducted from this figure. This results in a position where it does not represent a viable proposition for any investor, given the current Bank of England base rate is 3.75%.

On this basis, retaining the existing building and bringing it back into a good state of repair is not considered to be economically viable.

Additionally, the Condition Survey advises that further investigations are required in relation to potential structural concerns and that further investigations by a Structural Engineer are required. If it transpires that there are structural issues which need to be resolved then this would further add to the costs set out, which would only seek to exacerbate the viability issues.

Policy HA3 (Demolition of a Heritage Asset) of Supplementary Planning Document 21 (Locally Significant Heritage Asset) encourages the retention and sympathetic conversion of heritage assets, particularly where the asset is considered to be locally significant and makes a positive contribution to the local character or distinctiveness of an area. Demolition, in whole or in part, is considered the last resort.

Based upon the findings of the Building Condition Report and in line with Policy HA3 of SPD21 (Locally Significant Heritage Assets), whilst it is noted that demolition in whole or in part is considered a last resort, given the findings of the Condition Survey, and the fact that it is no longer deemed viable to bring the building back into a good state of repair in its current form, this is considered necessary and as such, the scheme is considered to be compliant with this local policy.

Furthermore, Paragraph 85 of the National Planning Policy Framework (NPPF) (2024) outlines that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. This is exactly what SRJ Energy Ltd are seeking to do with the proposals being brought forward through this planning application. They are seeking to invest in their existing petrol filling station site, expand its operations, and adapt the site to ensure that it continues to provide a high-quality service for the area and its customers.

Paragraph 125 of the NPPF confirms planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements.

Additionally, Paragraph 215 notes where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset (as concluded within the previously submitted Heritage Assessment, prepared by Border Archaeology), this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The full suite of benefits associated with the scheme can be summarised as follows:

- Redevelopment of a brownfield site within a sustainable location – with improvements and enhancements to the existing site;
- The creation of a new purpose-built forecourt shop / sales building, which is energy efficient and provides a high-quality experience for customers / members of the public and secures the longevity of the site;
- Creation of circa 9no. jobs, which will be staffed by local people, in addition to the retention of the existing 7no. employees; and
- Reduction of surface water run-off, as confirmed within the Flood Risk Statement and Drainage Strategy, prepared by Cora IHT.

The proposed development would therefore result in public benefits which are deemed to outweigh the harm arising from the loss of the local heritage asset, in line with Paragraph 215 of the NPPF and Policy 45 of the Emerging Local Plan.

It is noted that the low height of the proposed building is complementary to the existing built form of the locality and that it would lead to a positive contribution to the wider surroundings and ensure the brownfield site is redeveloped in a form which boosts the local economy and serves the local community.

The proposed development is a low-rise building, complementing the existing and surrounding built form. Furthermore, details of the CCTV, door security, cycle parking, level of lighting and vehicular access have been submitted as part of the application. The South Tyneside Senior Community Safety Officer has advised they have no crime and disorder concerns with respect to the scheme. All refuse is to be stored internally in order to reduce street clutter, and will be similar to the existing arrangement.

Given the costs in bringing the existing building back into a good standard of repair, it is considered the refurbishment of the existing building is not viable. Therefore, a redevelopment which

complements the existing built form of the area and provides social, economic and environmental benefits should be brought forward and supported in this context.

In this context, it is considered that the Council can support the proposal and that the application should be recommended for approval accordingly.

Further to reviewing the additional information submitted and the contents of this letter, if you have any questions or queries, please advise.

Yours faithfully,



Rapleys LLP