

PLAN 3.0

Closure (Obstruction to Application Route)
Construction of Offices, Market Dock, South Shields
By Mandale Construction Ltd.



NZ 35 67

2007 - 2008

Links to Photos and Documents

Photos

- 3.1** Photo - Access blocked at A
- 3.2** Photo - Access blocked at A
- 3.3** Photo - Access blocked at A
- 3.4** Photo - Access blocked at X1
- 3.5** Photo - Access blocked at X1
- 3.6** Photo - Access blocked at X1
supplied by Jeremy Good Planner Jan 2008
- 3.7** Photo - SW Corner
supplied by Jeremy Good Planner Jan 2008
- 3.8** Photo - Long Row
supplied by Jeremy Good Planner Jan 2008
- * **3.9** Photo - (North View - Crop) July 2007
supplied Air Images with Date Authentication
- * **3.10** Photo - (South View - Crop) July 2007
supplied Air Images with Date Authentication
- * **3.11** Photo - (East View - Crop) July 2007
supplied Air Images with Date Authentication
- * **3.12** Photo - (West View - Crop) July 2007
supplied Air Images with Date Authentication

* These photos can also be viewed Interactively at Bing Maps (Birds Eye) at the URL
<https://www.bing.com/maps?cp=55.001878%7E-1.440039&lvl=18.6&style=g&dir=85.7>

Or view the raw images from Air Images
(See Document 3.16)



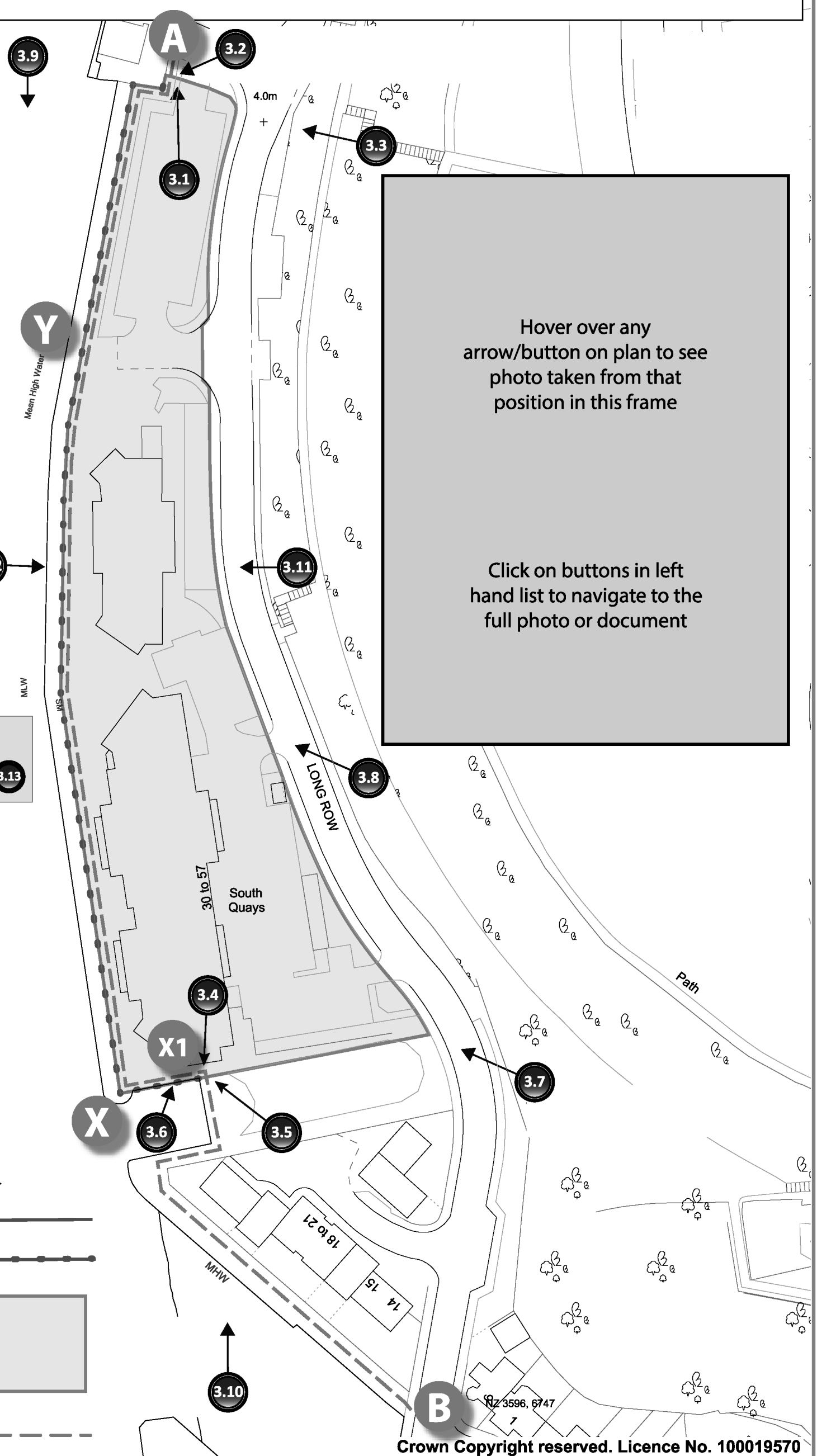
Documents

Professional referred to in the applicant's DMMO submission **

- 3.14** Statement - [Redacted] **
Planner for Mandale Construction
- 3.15** Statement - [Redacted] **
Artisan Architecture Ltd.
- 3.16** Authentication Document
Air Images 2007 relating to Photos marked *
and associated cropped images.

KEY

- Photo and direction of view
- Physical Barrier Hoarding
- Physical Barrier Railing
(brick wall northernmost end)
- Enclosed Area
No Public Access Allowed
- Application Route

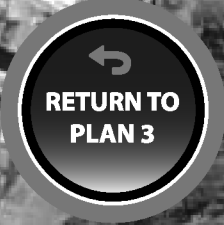


Hover over any arrow/button on plan to see photo taken from that position in this frame

Click on buttons in left hand list to navigate to the full photo or document

PHOTO 3.1

Close up view of obstruction point A from South (July 2007)



A

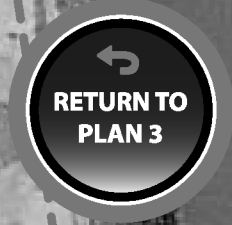
No route possible through 2.4m hoarding

Application Route



PHOTO 3.2

Close up view of obstruction
Point A from North (July 2007)



Application Route

No route possible
through 2.4m hoarding

A



PHOTO 3.3

Close up view of obstruction point A from East (Jan 2008)

RETURN TO
PLAN 3



PHOTO 3.4

Close up view of obstruction
Point X1 from North (July 2007)

RETURN TO
PLAN 3



PHOTO 3.5

Close up view of obstruction
Point X1 from South (July 2007)

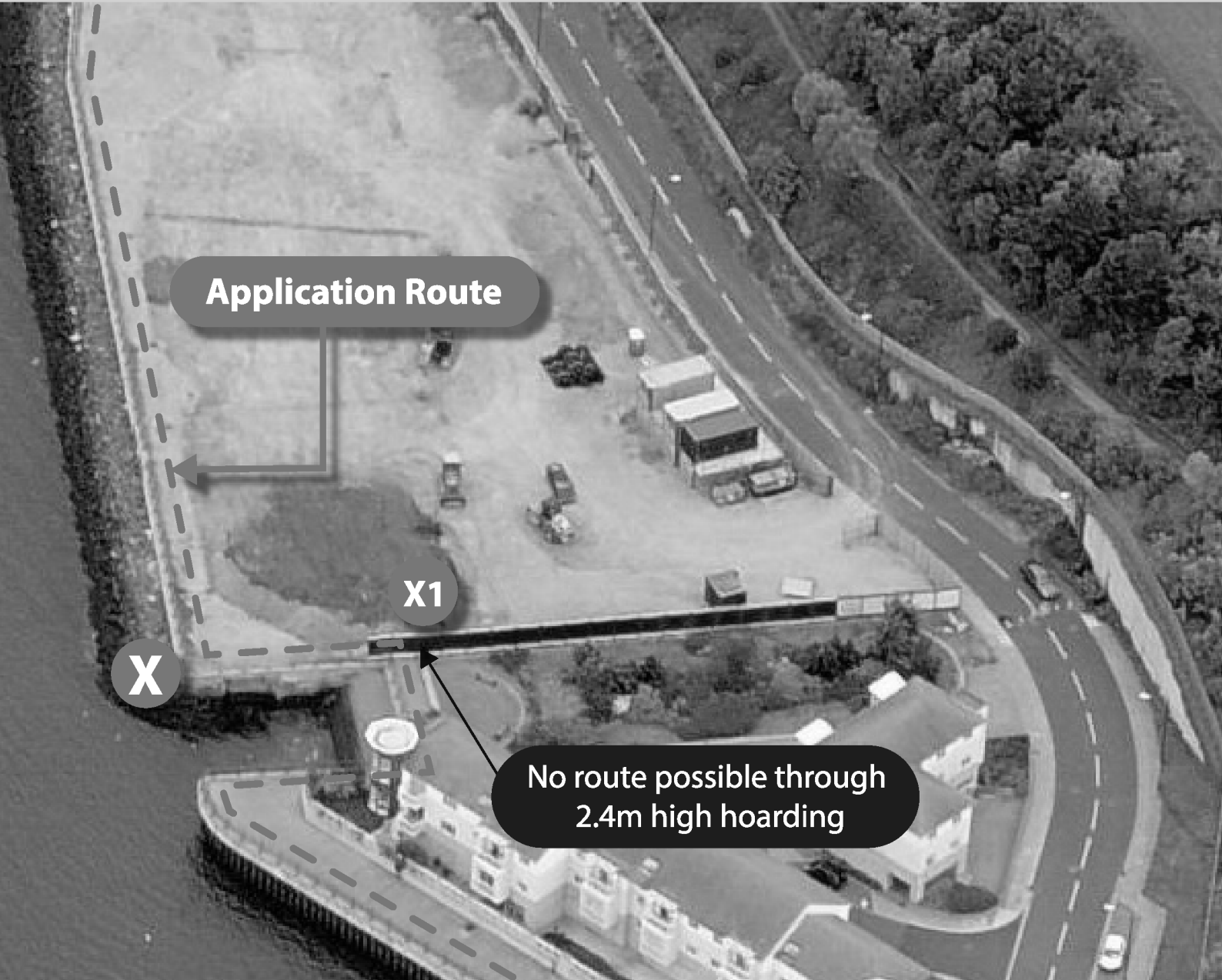


PHOTO 3.6

Picture supplied by [REDACTED]
(Jan 2008)

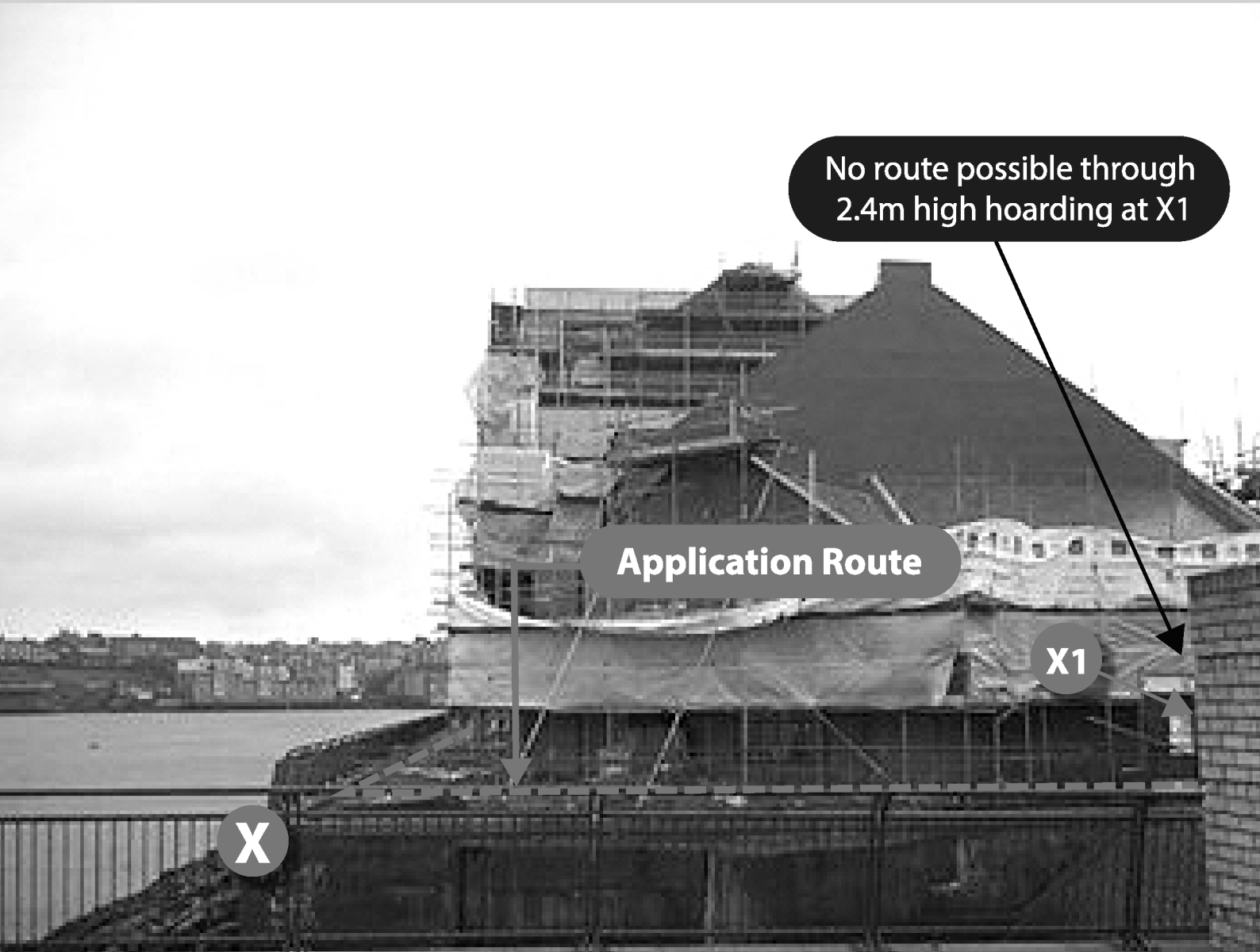


PHOTO 3.7

Picture supplied by [REDACTED]
(Jan 2008)



PHOTO 3.8

Picture supplied by [REDACTED]
(Jan 2008)

RETURN TO
PLAN 3



PHOTO 3.9 (North View)

Crop from date authenticated aerial photo - Air Images,
"South Shields_Tyne and Wear_Ne331JA_Oblique_North"
July 2007

RETURN TO
PLAN 3

B

X

X1

Application Route

A



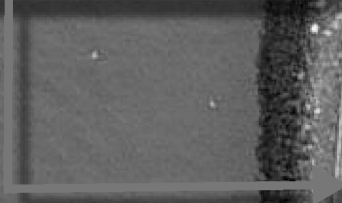
PHOTO 3.10 (South View)

Crop from date authenticated aerial photo - Air Images,
"South Shields_Tyne and Wear_Ne331JA_Oblique_South"
July 2007



A

Application Route



X

X1

B

3.10



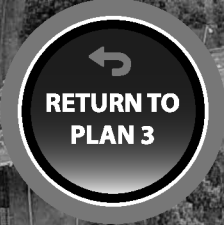
PHOTO 3.11 (East View)

Crop from date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_East" July 2007



PHOTO 3.12 (West View)

Crop from date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_West" July 2007



Application Route

A

X1

B

X

No route possible through 2.4m high hoarding



Our Ref. 22/07

Date: 11th October 2023

To whom it may concern Statement of Truth:

Garlands Call Centre, 30/31 Long Row, South Shields, NE33 1JA (AKA Market Dock)

I, [REDACTED] Chartered Town Planner, and currently a director of England & Lyle Limited (now trading as ELG Planning), acted for the Mandale Group through their architect SJD, between February 2007 and August 2008 in connection with Mandale's development of the Garland's Call Centre site.

1. I can confirm that a fixed hoarding was erected along the complete perimeter of the site, extending into and connected to steel railing at the top of the rock armour along the river edge. The result of this was that the site was fully enclosed. (See below the photograph captioned "Base Plan - Bing Maps Image Circa 2007", showing the site enclosure boundary depicted by a red dotted line).

2. The purpose of this enclosure was not only to provide complete security for the site, but also to prevent any unauthorised public access to it. The physical boundary is clearly shown on "Bing Maps" historic (circa 2007) imagery which is still available online under the menu "Birds Eye".

[Bing Maps - Directions, trip planning, traffic cameras & more](#)

The Bing Maps image below was taken from the above link. Furthermore, the photographs I took in January 2008 (numbered 1 to 3 below and on Plan) also confirm the existence of this physical boundary. The site was fully secured in this way from around May 2007 and remained this way until around August 2008 by my recollection.

3. Throughout the construction period, the site was consistently manned by working personnel and security staff. This ensured strict adherence to our no-public-access policy.

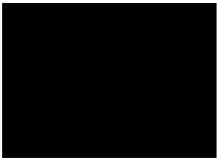
4. Furthermore, throughout the duration of the construction project, in my capacity as the chartered town planner, acting for Mandale, I was not aware that any objections were received that either the works or the site closure were preventing the use of any public or other path.

5. I have appended a plan showing the location of the hoarding that was erected during the period referred to above, together with the existing railings to the western boundary of the site. The plan is annotated to show the location from which the photographs below were taken and the direction in

which the photographer was looking at the time. The plan also shows the route of the claimed footpath and, in particular, where that route intersects the physical barriers which were erected and maintained during the period referred to in paragraph 2 above. There is no possibility that the public could have crossed the site perimeter at the points identified on the plan below as "Northern Terminus" (Point A) or "Southern Terminus". The only access to the site, which was used for authorised personnel and construction traffic, was by the two site gates located on the Eastern border of the site as identified on the plan.

6. The adoption of stringent security measures, including the boundary hoarding and the continuous presence of authorised personnel referred to above, prevented any unauthorised entry to the site. I recall having to seek permission from the site manager to access the site myself.

Kind Regards,



Director



Base Plan - Bing Maps Image Circa 2007

Site Enclosure Boundary - - - - -



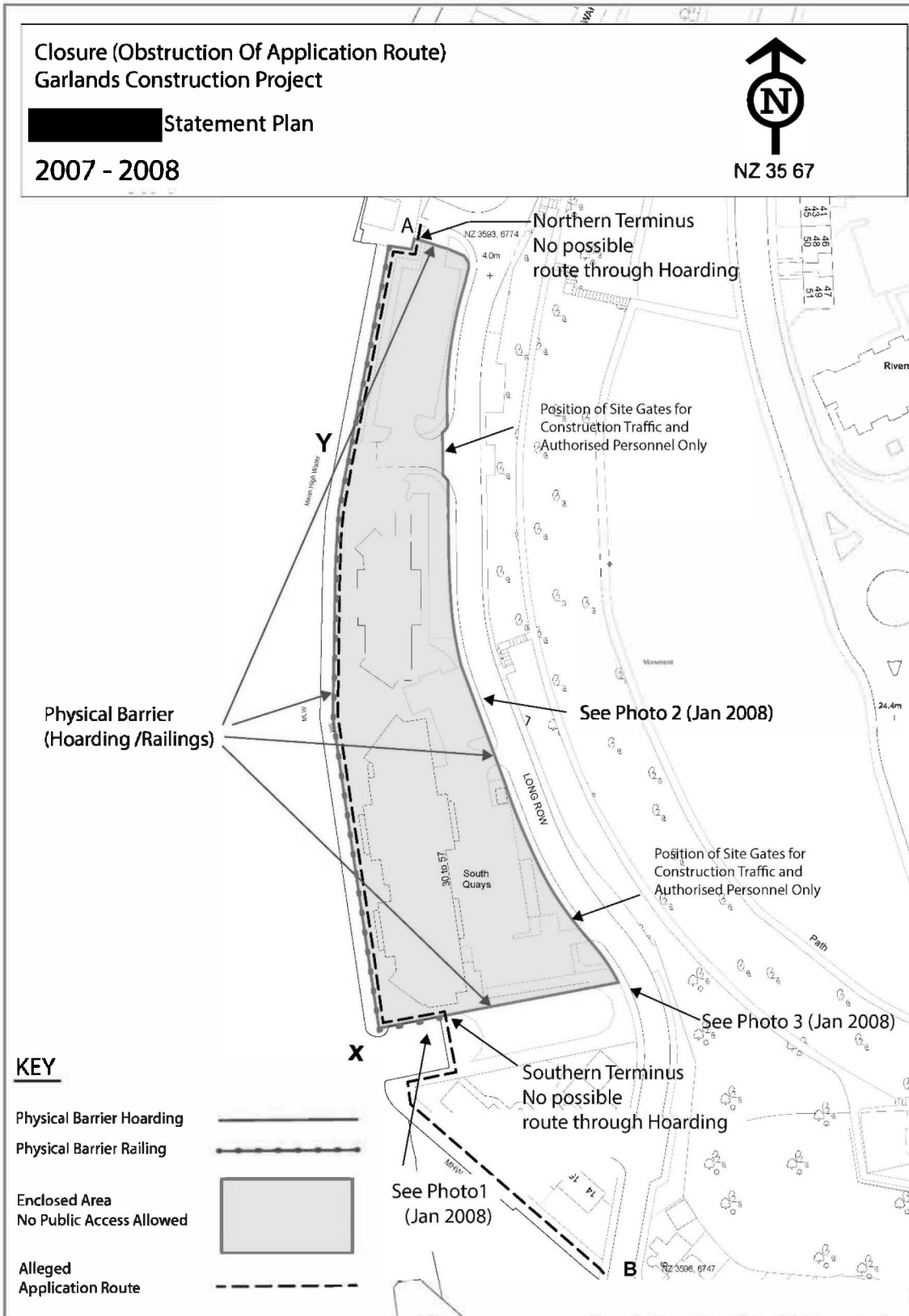
Photo 1



Photo 2



Photo 3





ARTISAN ARCHITECTURE

SOUTH SHIELDS BUSINESS WORKS
HENRY ROBSON WAY
STATION ROAD
SOUTH SHIELDS
NE33 1RF



Statement of Truth

Attestation Regarding Construction Site Access


Name: 

Position: Owner

Company Ref : Wearmouth Architectural Design, The Studio, Park View, South Shields, NE33 4SE

ST/01537/04/DM

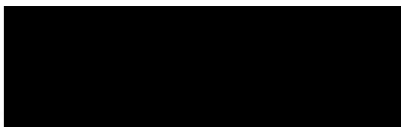
Date: 26/09/2023

I,  of Artisan Architecture Ltd. (Formerly Wearmouth Architectural Design), hereby attest to the following facts regarding the construction site for which I was initially involved as the applicant's agent for the planning application for this development ref ST/01537/04/DM:

As both the initial planning applicant's design/planning agent for new office development and a local resident who frequently walks along the adopted footpath on Long Row immediately adjacent and to the East of the site, I can affirm that I visited this site location on many occasions once construction (by Mandale Group Ltd.) had commenced in 2007 and confirm with complete confidence that during this construction period from 2007 till mid 2008 the development site was fully closed to the public by substantial closed board hoarding which interlinked with the existing riverside railings to form a closed physical boundary. This is substantiated by the attached aerial photograph (taken some time in 2007), and can be verified independently via Microsoft Bing maps. *(Which still shows the historical imagery of the site in 2007 under the Birds Eye view menu).*

It was not possible to walk along the "Application Path" route, as detailed on the attached plan, since it was blocked off at the position X1 and at the position A on that plan by the hoarding that was approx. 2.4m high.

Signed,



Artisan Architecture Ltd.

Closure (Obstruction Of Application Route)

Statement Plan

2007 - 2008



NZ 35 67

Northern Terminus
No possible
route through Hoarding

Southern Terminus
No possible
route through Hoarding

KEY

Physical Barrier Hoarding



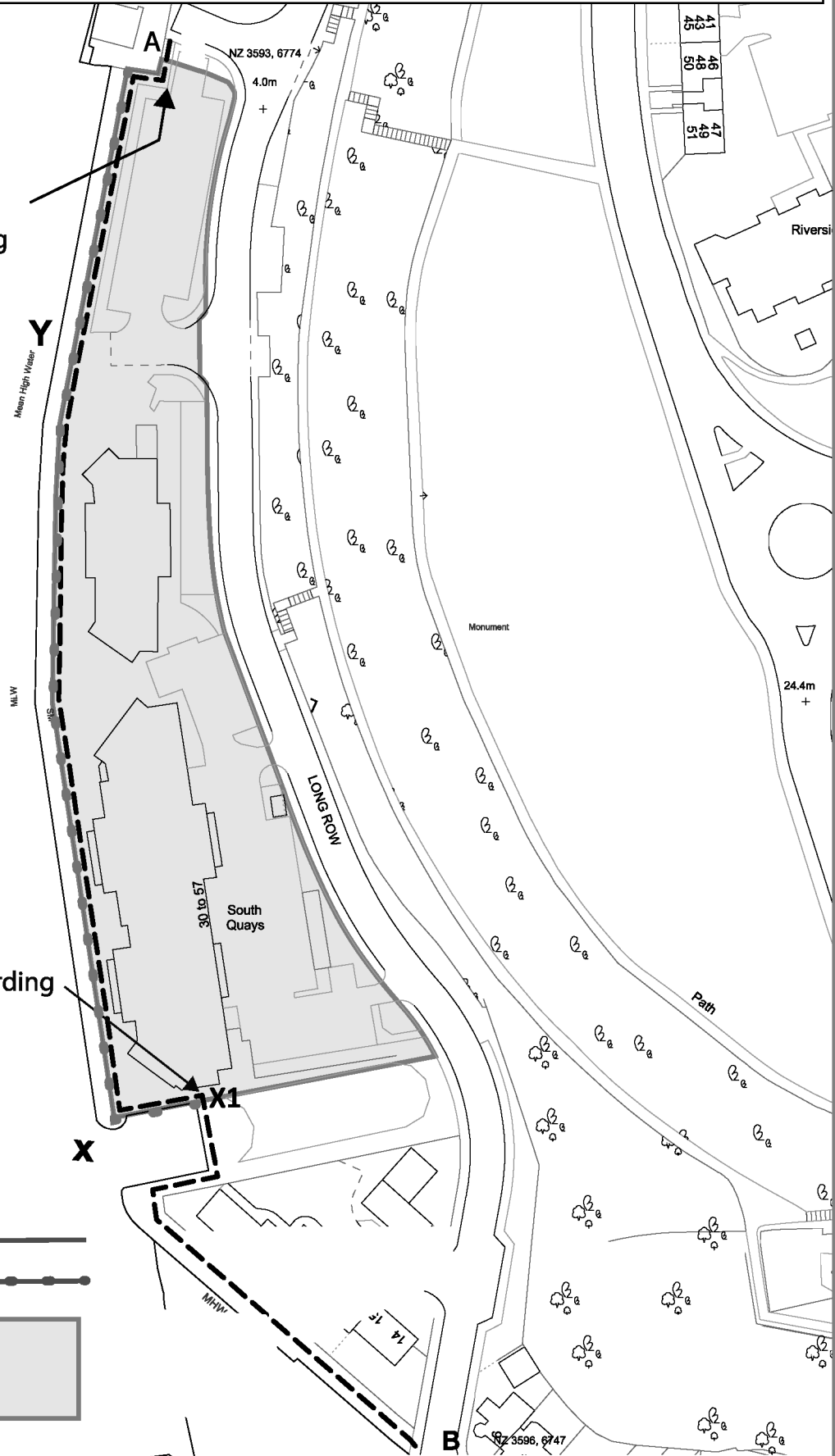
Physical Barrier Railing



Enclosed Area
No Public Access Allowed



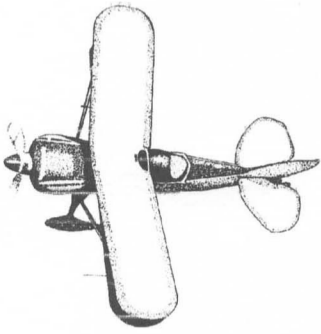
Alleged
Application Route





- Aerial Photograph depicting site enclosure 2007
NE33 1JA : Source Microsoft Bing Maps

End of Statement - Return to Plan 3



AIR IMAGES

www.aerialphotography.com

SPECIALISTS IN AERIAL PHOTOGRAPHY

NUNSBROUGH HOUSE, HEXHAMSHIRE,
NORTHUMBERLAND, NE46 1SY



6th September 2023

Dear [REDACTED]

Aerial Photography – South Shields NE33 1JA

Location Grid Reference: 435919, 567564

Image References:

**South Shields_Tyne and Wear_NE33 1JA_Oblique_North
South Shields_Tyne and Wear_NE33 1JA_Oblique_South
South Shields_Tyne and Wear_NE33 1JA_Oblique_East
South Shields_Tyne and Wear_NE33 1JA_Oblique_West
South Shields_Tyne and Wear_NE33 1JA_Ortho_vertical**

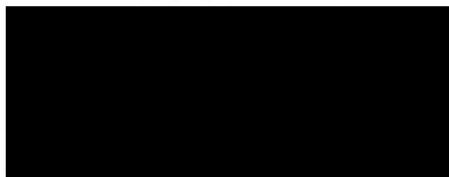
Thank you for your recent order for archive aerial photography.

I confirm that the 5 photographs supplied, references above, were taken on the following date:

31st July 2007

Please do not hesitate to contact me if you require further assistance.

Yours sincerely,



Director.



PHOTO 3.9 (North View)

Date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_North" July 2007



PHOTO 3.10 (South View)

Date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_South" July 2007



PHOTO 3.11 (East View)

Date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_East" July 2007



PHOTO 3.12 (West View)

Date authenticated aerial photo - Air Images, "South Shields_Tyne and Wear_Ne331JA_Oblique_West" July 2007



PHOTO 3.13 (Vertical View)

Date authenticated aerial photo - Air Images,
"South Shields_Tyne and Wear_Ne331JA_Ortho_Vertical"
July 2007

