

## International Advanced Manufacturing Park Area Action Plan

Sustainability Appraisal - Post Publication Draft Consultation Addendum

February 2017



South Tyneside Council



ARUP

# International Advanced Manufacturing Park Area Action Plan

## Sustainability Appraisal - Post Publication Draft Consultation Addendum

February 2017 |

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 242745-10

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**ARUP**

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### Appendix A

Consultation responses relevant to the Sustainability Appraisal

## **1 Purpose of this Addendum**

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This addendum has been written following the completion of public consultation on the Publication Draft of the IAMP Area Action Plan (AAP), and the Sustainability Appraisal (SA) Report published alongside it.

It provides a summary of the key consultation responses of relevance to the SA, and how the SA process and the development of the AAP has responded to them.

## **2 Consultation on the IAMP AAP and Sustainability Appraisal**

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### **2.1 AAP and SA Consultation process**

Public Consultation on the IAMP AAP Publication Draft took place between the 8<sup>th</sup> August 2016 and the 26<sup>th</sup> September 2016, with an extension to 10<sup>th</sup> October 2016 for some parties where sufficient notice being given was uncertain. This consultation allowed respondents to comment on the soundness of the proposed AAP. The SA Report was also provided for public consultation alongside the IAMP AAP Draft. This Addendum should be read in conjunction with the SA Report (PSD4). The SA Report sets out the purpose (Section 1), methodology (Section 4), and assessment (Sections 7 and 8) of the sustainability appraisal.

A total of 39 responses were received (PSD8). The majority of these related solely to the draft AAP; three responses specifically referred to the SA Report. These were from Historic England, Natural England, and Durham Birds Club, and are included in Appendix A of this Addendum. A further response from Sport England did not specifically refer to the SA, but necessitated changes to the AAP.

### **2.2 Consultation Responses which reference the Sustainability Appraisal process**

#### **2.2.1 Response from Historic England**

Historic England (HE) submitted a consultation response dated 26 September 2016 (PSD8). This response referred to earlier consultation submissions on proposed options for IAMP dated 3 February 2016, and on the Scoping Opinion for the EIA dated 15 September 2016.

The key points raised in the response are set out below:

- Limited references to heritage assets in the AAP and supporting documents and an apparent lack of consideration of the historic assets, by reference to the absence of an evidence base;
- Alleged failure to consider the potential impacts upon those designated and undesignated assets identified within Table B1.7 of the SA;

- Alleged failure to assess the significance of each relevant heritage assets in order to inform an assessment of the potential impacts in accordance with the National Planning Policy Framework (“NPPF”)
- Absence of any reference to the NPPF requirements and statutory duties to conserve and enhance heritage assets

The response concluded that “by addressing the historic environment within the SA Report, providing sufficient evidence, and amending the relevant AAP policies to set out how they will sustain and enhance the significance of heritage assets, then the plan will readily meet the legal requirements”.

### 2.2.2 Response from Natural England

Natural England submitted a consultation response dated 29 September 2016 (PSD8). The key points raised in the response were that:

- There are no indicators that specifically address biodiversity, water quality and habitat along the River Don
- That monitoring indicators relate to the effects of the plan itself, not wider changes and that bespoke indicators should be chosen relating to the outcomes of development management decisions.

The consultation response then goes on to suggest appropriate indicators on Biodiversity and Green Infrastructure:

***“Biodiversity:***

- *Any adverse impacts on sites of acknowledged biodiversity importance as a result of the development and related planning permissions;*
- *Overall biodiversity enhancement/hectares of biodiversity habitat delivered as a result of the development and related planning permissions.*
- *Improvements in water quality of the River Don as a result of the development and related planning permissions.*

***Green infrastructure:***

- *Changes to the percentage of the city's population having access to a natural greenspace within 400 metres of their home as a result of the development and related planning permissions;*
- *Length of greenways constructed;*
- *Changes in hectares of accessible open space per 1000 population.”*

### 2.2.3 Response from Durham Birds Club

Durham Birds Club submitted a consultation response dated 18 September 2016 (PSD8).

The response from Durham Birds Club comments directly on the importance of the area in terms of biodiversity and bird habitats, and provides comment on the wording of policies within the AAP.

The response also specifically responds to the Sustainability Appraisal Report, and notes that:

- “it does not refer to the North East Local Nature Partnership (NELNP)”

It also notes that the Durham Biodiversity Action Plan (DBAP), which is referred to in the SA Report, did not properly address the current situation regarding priority birds in the county, and that in discussion with the NENLP a new list of priority species was drawn up earlier in 2016.

The submission comments that the “AAP...can go much further to help enhance biodiversity as part of this site” and “the AAP should positively seek to improve habitats for farmland birds...”.

## **2.3 Additional consultation responses relevant to the SA**

A further consultation response from Sport England was noted as being relevant to the SA process and findings:

### **2.3.1 Sport England**

Sport England submitted a consultation response on 22 September 2016 (PSD8).

Sport England objected to the Publication Draft AAP due to the failure to acknowledge the presence of a playing field site located within the plan area. The response noted the failure to consider how development could proceed whilst satisfying paragraph 74 of the NPPF and Sport England’s playing field policy.

## 3 How the AAP and Sustainability Appraisal has responded to consultation

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### 3.1 Cultural Heritage

#### 3.1.1 Limited references to heritage assets and appropriate evidence base

The response from HE (PSD8) concluded that in the absence of additional appraisal as detailed in paragraph 2.2.1 above the draft AAP would not be sound or legally compliant.

The consultation response noted the lack of an appropriate evidence base; failure to consider impact on designated and undesignated assets; failure to assess the significance of relevant heritage assets; and absence of reference to NPPF requirements and statutory duties.

Subsequent to receipt of the consultation response from HE a Statement of Common Ground has been agreed between Sunderland City Council & South Tyneside Council, and HE (PSD8). The Statement of Common Ground summarises the process whereby the Councils have worked with HE to agree minor changes to the AAP and supporting evidence base to satisfy the concerns of HE.

The agreed modifications to the AAP are summarised as:

- amended detail on the IAMP Site Masterplan Objectives which makes explicit reference to the presence of the Grade II listed Hylton Bridge and previous railway infrastructure within the site which is no longer present;
- an additional Masterplan Objective: “Preserving and enhancing heritage assets: This objective seeks to preserve and enhance the Grade II listed Hylton Grove Bridge and its setting within the River Don corridor, together with the setting of other heritage assets in the vicinity of the IAMP AAP boundary.”
- amendment to Policy D1: Masterplan Design to read “*Have special regard to preserving and enhancing the significance, including any contribution made by their setting, of heritage assets within and in proximity to the site, including Scot’s House (Grade II\*) on the south side of the A184, Hylton Grove Bridge (Grade II) on Follingsby Lane and views from elevated locations such as Boldon Downhill and the Penshaw Monument*”
- Inclusion of Grade II Listed Hylton Bridge as a feature on the Policies Map with reference to Policy D1.

HE have withdrawn their objection to the Publication Draft AAP based on these revisions.

### 3.1.2 Mitigation of impact on cultural heritage assets

The revised Policy D1 refers to the need to preserve and enhance the significance, including contribution from the setting of heritage assets within and in proximity to the site. Further it explicitly references designated assets and views from elevated locations.

Policy T2 will also restrict access along Follingsby Lane for local access and public transport only, which will help to reduce traffic flows preserving the setting of the bridge within the River Don corridor.

Additionally it should be noted that the AAP is proposed in the context of other existing local planning policy documents which seek to protect and enhance heritage assets. These are summarised below.

<b>Sunderland City Council</b>	
Draft Core Strategy and Development Management Policies	Heritage is referred to twice within this document. The Core Strategy states that the historic environment of the city will be protected, conserved and enhanced where possible. It further expands upon this by stating that the City Council will support proposals that have a positive impact on the City's heritage assets and local historic character. It refers to development affecting heritage assets to recognise and respond to their significance and values and demonstrate how they conserve and enhance the significance and character of the asset.
Sunderland Unitary Development Plan (Saved policies)	There is a comprehensive suite of policy contained within the UDP relating to heritage. It is recommended that Appendix A is referred to for more detail. Common themes across all policies are as follows; the historic environment should be protected, conserved and enhanced, proposals that have a positive impact on the historic environment will be supported and conversely refused if there is an adverse impact (unless exceptional circumstances prevail) and archaeological heritage should be protected.
<b>South Tyneside Council</b>	
South Tyneside LDF Development Management Policies	There is only one policy referring to heritage contained within the DM policies however it is comprehensive referring to all the main themes covered within Sunderland City Council's policies including support for development that protects, preserves and enhances heritage assets and requiring archaeological deposits and remains to be recorded and archaeological deposits to be identified, recorded and if possible left in situ.

## 3.2 Ecology and habitats

### 3.2.1 Monitoring arrangements

The responses from Natural England and Durham Birds Club (PSD8) were focused on the inclusion of appropriate indicators in the monitoring framework on Biodiversity and Green Infrastructure. Natural England commented that draft indicators in the SA focused on measuring metrics influenced by factors outside the plan. The revised indicators suggested by Natural England, and included in the revisions below, have been chosen to relate more directly to the outcomes of development management decisions within the area covered by the AAP. The updated monitoring indicators for biodiversity and green infrastructure are shown



below (the original suggested indicators have been removed, and revised indicators added).

Sustainability Objective	Sustainability Questions	Original suggested Indicators	Revised Indicators
4	<p>Conserve and enhance biodiversity.</p>	<p>Will it protect and/or improve biodiversity?</p> <p>Will it protect environmentally designated sites?</p>	<ul style="list-style-type: none"> <li>• Area and condition of SSSIs.</li> <li>• Area of Local Wildlife Sites.</li> <li>• Area of Geodiversity sites.</li> <li>• Areas of undesignated Biodiversity Action Plan (BAP) priority habitat.</li> </ul> <ul style="list-style-type: none"> <li>• Improvements in water quality of the River Don as a result of the development and related planning permissions.</li> <li>• No deterioration in water quality of ponds</li> <li>• No deterioration in quality of Habitats of Principal Importance and local BAP habitats (not otherwise designated).</li> <li>• No deterioration in the status of Local Wildlife Sites affected by the AAP as a result of the development and related planning permissions (with exclusion of Elliscope Farm East / Hylton Bridge LWS, which will be affected by the bridge crossing)</li> <li>• Total area of biodiversity habitat delivered as a result of the development and related planning permissions.</li> <li>• Area of Geodiversity sites within the AAP area</li> </ul>
5	<p>Protect and enhance our Green Belt and green infrastructure.</p>	<p>Will it protect the openness and purposes of the Green Belt?</p> <p>Does it contribute to the redevelopment of previously developed land?</p> <p>Will it protect and/or enhance open space and outdoor sports provision?</p>	<ul style="list-style-type: none"> <li>• Area of Green Belt.</li> <li>• Number and scale of developments in Green Belt.</li> <li>• Economic development.</li> <li>• Completions on Green Belt land.</li> </ul> <ul style="list-style-type: none"> <li>• Changes to the percentage of the city's population having access to a natural greenspace within 400 metres of their home as a result of the development and related planning permissions;</li> <li>• Length of greenways constructed;</li> <li>• Changes in hectares of accessible open space per 1000 population.</li> </ul>

The remaining monitoring framework presented in the Sustainability Report is unchanged.

### 3.2.2 Reference to NELNP and priority species

The response from Durham Birds Club noted the absence of NELNP in the review of policy documents, and reference to an updated list of priority bird species.

It is acknowledged that inclusion of NELNP within the baseline information included within Appendix C1.1 would have been a useful contribution, and that the reference to the updated list of priority species should have been included to provide a more up-to-date statement of the environmental context.

The information provided in the response from Durham Birds Club has been addressed in the Ecology Technical Background Report. The assessment of significant impacts arising from the AAP on protected birds, assessed against the Sustainability Framework, is not changed by inclusion of this additional information. However, references to the consultation response will be included in the post-adoption statement for the Sustainability Appraisal.

### 3.3 Sport England

Subsequent to the receipt of the consultation response from Sport England a Statement of Common Ground (PSD8) has been agreed between Sunderland City Council & South Tyneside Council, and Sport England. The Statement of Common Ground summarises the process whereby the Councils have worked with Sports England to agree minor changes to the AAP and supporting evidence base to satisfy the concerns of Sports England.

The agreed modifications to the AAP are summarised as:

- amended detail on the IAMP Site Masterplan Objectives which makes explicit reference to the North East Land Sea and Air Museum, and the presence of approximately 2.5ha of playing fields located adjacent to the museum;
- amendment to Policy S1: Comprehensive Development (supporting text) which has been revised to state *““This policy releases 100ha of land to the north of Nissan within the IAMP AAP boundary from the Green Belt for allocation for employment uses. Within the AAP area the current North East Land Sea and Air Museum is present and is anticipated to remain on the site. There is also approximately 2.5ha of playing fields located adjacent to the Museum. These will be retained on the site until deemed surplus to requirement by an up-to-date Playing Pitch needs assessment, in consultation with Sport England. Should the playing fields be required for development prior to being evidenced as surplus to requirements, they should be re-provided in accordance with Sport England’s playing field policy exception E4.”*

Sport England have withdrawn their objection to the Publication Draft AAP based on these revisions.

## 4 Next Steps

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The AAP and Technical Background Reports have been revised, reflecting the range of responses collected during public consultation on the Publication Draft.

The full detail of how the AAP has developed following consultation is detailed in the IAMP Area Action Plan Schedule of Proposed Modifications February 2017.

Following revisions to the AAP, and aligning with adoption of the AAP by the two local authorities, a Post-adoption statement for the SA will be produced. This will document changes to the SA process, and any resultant changes in the AAP arising from these.

## **Appendix A**

**Consultation responses relevant  
to the Sustainability Appraisal**

# A1 Historic England

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Historic England

Claire Harrison  
Sunderland City Council  
Project Office  
Civic Centre  
Burdon Road  
Sunderland  
SR2 7DN

Our ref: PL00034147  
Your ref:



Date 26 September 2016

[Sent by email to: iamp@sunderland.gov.uk](mailto:iamp@sunderland.gov.uk); [iamp@southtyneside.gov.uk](mailto:iamp@southtyneside.gov.uk)

Dear Ms Harrison

### Consultation on International Advanced Manufacturing Park for the North East Region: Draft Area Action Plan

Thank you for consulting Historic England on the International Advanced Manufacturing Park (IAMP) for the North East Region Draft Area Action Plan (AAP). As the Government's statutory adviser on all matters relating to the historic environment in England, we are pleased to offer our comments. We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, conserved and enjoyed.

We have previously commented on the proposed options for the IAMP (our email of 3 February 2016 refers) and more recently on the Scoping Opinion for the EIA (our letter to PINS of 15 September 2016). Our earliest response notified the council of the designated heritage assets within the vicinity, including the Grade II listed Hylton Grove Bridge within the site boundary. We pointed out the requirement under the NPPF that local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In addition, the effects of development upon both designated and undesignated heritage assets should be considered, to assess any potential impact upon their significance including any contribution made by their setting. We also recommended that, again to be compliant with the NPPF, options for the site should be informed by an up-to-date and robust historic environment evidence base, and a proper assessment made of the likely impact of the different allocation options upon the significance of any heritage assets affected.

We are therefore surprised and concerned to note that the draft AAP, its accompanying Sustainability Appraisal (SA), and the Planning Policy Technical Background Report, make virtually no reference to heritage assets, and we can only find one passing reference to the designated asset within the plan document (AAP Policy D1 (vi)). The designated asset within the centre of the site is not identified on any of the site plans, and none of the IAMP AAP supporting documents appear to have considered the historic environment or provided an evidence base. In addition, the Sustainability Appraisal assessment has failed to identify the designated assets within Table B1.7 of its appendix, or consider any impacts upon designated or undesignated assets within the appraisal, even stating in Table 4 that



Historic England, Bessie Surtees House, 41-44 Sandhill, Newcastle Upon Tyne NE1 3JF  
Telephone 0191 269 1255 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



*'The presence of cultural assets in, and around, the areas considered for the AAP are limited. Without the introduction of the AAP it is expected that the range, scale and condition of cultural assets will broadly continue as recent trends indicate.'*

For these reasons, we do not consider that the draft AAP is sound or legally compliant. Our comments with regards specific sections are as follow.

Page 8, section 3.1: This section states that the IAMP AAP has been developed in accordance with the requirements of the NPPF, including the presumption in favour of sustainable development. However, as we have noted above, we can find little evidence that the plan has been prepared in accordance with the NPPF guidance on the historic environment. The NPPF provides clear guidance on cultural heritage in its section 12, including in paragraph 129 which states that *'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'* We can find no evidence within the AAP, the supporting evidence, or the SA, that this has been done. It is also worth noting that the NPPF is clear in paragraph 7 that there are three dimensions to sustainable development, and the environmental role includes the need to protect and enhance the historic environment.

Page 10, section 3.3: As noted above, the AAP does not appear to be supported by any evidence on cultural heritage or the historic environment. It is therefore unclear how the AAP is compliant with paragraph 169 of the NPPF.

Page 20, section 4.4: We welcome the intention to steer the heights of buildings within the scheme to reduce impacts on views from areas such as the Peshaw Monument, which is a Grade 1 Listed Monument.

However, there is no mention within the supporting text of the need to sustain and enhance the historic environment, as required by the NPPF. Although there is mention of listed buildings within Policy D1, the wording of this policy only requires proposals to *'give consideration to the setting of listed buildings ...'*, which is inadequate protection, referring only to the setting of the asset and not providing any protection for the asset itself. This policy is therefore non-compliant with both the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. We would draw your attention in particular to paragraphs 126 and 132 of the NPPF, and to section 66 of the Act, which states that *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'*

Page 28, section 6.1: We recognise that the AAP contains many positive proposals, including setting out principles on landscape design in policy EN1. However, again there is no mention of the historic environment, despite the supporting text referring to how the policy focuses on the protection and enhancement of the built environment.

Policies Map: As noted above, the Policies Map – while identifying locally important wildlife sites – has failed to identify the nationally important Grade II listed asset in the centre of the site, which is a major omission.



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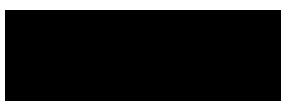
Correspondence or information which you send us may therefore become publicly available.



Unfortunately, for the reasons outlined above, we do not consider that the draft AAP, as currently presented, can be found sound, as it is not supported by sufficient evidence or compliant with national policy. However, we are confident that, by addressing the historic environment within the SA, providing sufficient evidence, and amending the relevant AAP policies to set out how they will sustain and enhance the significance of heritage assets, then the plan will readily meet the legal requirements.

We hope that these comments are helpful, but please do not hesitate to contact us should you require any further information.

Yours sincerely



Barbara Hooper  
Principal, Historic Places Team



Historic England, Bessie Surtees House, 41-44 Sandhill, Newcastle Upon Tyne NE1 3JF  
Telephone 0191 269 1255 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.





## A2 Natural England

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Date: 29 September 2016  
Our ref: 192912  
Your ref: International Advanced Manufacturing Park, Area Action Plan  
Consultation



Iain Fairlamb  
Head of Planning and Regeneration  
Sunderland City Council  
Civic Centre  
Burdon Rd  
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**BY EMAIL ONLY**

Dear Iain Fairlamb,

**Planning consultation:** International Advanced Manufacturing Park, Area Action Plan Consultation  
**Location:** Sunderland City Council, South Tyneside Council

Thank you for your consultation on the above dated 08 August 2016 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

**IAMP Area Action Plan (AAP)**

Natural England welcomes Policy EN2: Ecology. We are aware of the environmental workshops that are taking place with regards to the IAMP and the AAP seems to reflect the intentions on biodiversity. However, even though the text in section 6.2 on Ecology (p 29) mentions the enhancement of the ecological value of the IAMP, Policy EN2 limits itself to maintaining and protecting wildlife habitats. In line with NPPF paragraph 109, we advise to reword policy EN2 to:

“A. To maintain and enhance biodiversity and protect and enhance wildlife habitats”.

Natural England also welcomes policies EN1: Landscape design and EN3: Green Infrastructure (GI). Section 6.3 on Green Infrastructure states that:

“This policy sets out the principles for the creation of Green Infrastructure. It takes account of the multiple benefits of Green Infrastructure for habitat creation, recreation, visual amenity, health and wellbeing” (p 30).

We advise that improved flood risk management and climate change adaptation are also benefits of Green Infrastructure. This is also the function of the SuDS that are mentioned later in the text and that are part of Green Infrastructure also.

**IAMP Habitat Regulations Assessment Stage 1 Screening - No objection**

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.

## **IAMP Sustainability Appraisal Report**

We concur that there are potential significant impacts on biodiversity and habitat, particularly in the vicinity of the River Don.

As set out in [Planning Practice Guidance](#), you should be monitoring the significant environmental effects of implementing the AAP. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). In addition, the report refers to mitigation that is in place, namely "Objective 13 specifically gives consideration to water quality and habitat connectivity along the River Don". However, there are no indicators that address these impacts specifically.

The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate:

### **Biodiversity:**

- Any adverse impacts on sites of acknowledged biodiversity importance as a result of the development and related planning permissions;
- Overall biodiversity enhancement/hectares of biodiversity habitat delivered as a result of the development and related planning permissions.
- Improvements in water quality of the River Don as a result of the development and related planning permissions.

### **Green infrastructure:**

- Changes to the percentage of the city's population having access to a natural greenspace within 400 metres of their home as a result of the development and related planning permissions;
- Length of greenways constructed;
- Changes in hectares of accessible open space per 1000 population.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Ellen Bekker  
Northumbria Area Team

## **A3**     **Durham Birds Club**

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## Durham Bird Club

Registered Charity No 515101

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

18 September 2016

[REDACTED]

Project Office,  
Room 3.8,  
Civic Centre,  
Burdon Road,  
Sunderland  
SR2 7DN

Dear Sir

### **INTERNATIONAL ADVANCED MANUFACTURING PARK PROPOSED AREA ACTION PLAN**

I refer to the consultation into the proposed Area Action Plan. I have already responded to the previous consultation into the IAMP on behalf of the Club in my letter dated 21 January. I believe the principles mentioned there remain valid.

I have considered the Habitats Regulations Assessment. The Club accepts that there are no European sites within the area of the proposed AAP and that the proposed development of the AAP is unlikely to detrimentally impact upon the named European sites at the coast for the reasons given in the Assessment.

That said, the Club does still consider this general area to be important. The nearby Barmston Pond is shown as a Birdwatching Site in its Annual Reports and in its recently published book, the Birds of Durham. This book, which was part of the Club's Avifauna Project addressing the history of birding in the County, was funded by the Heritage Lottery Fund. It considers habitats throughout the Club's area (which includes Sunderland and South Tyneside), including the Durham lowlands and wetland habitats in the County.

The section on the Durham lowlands starts at page 22. While it does not specifically deal with the area covered by this AAP, it does note the interest of the nearby Wear valley. At page 24, it notes that the county's agriculture is largely mixed and that the county still, compared with other parts of England, has a relatively large number of hedgerows. It does however note that many of these

have suffered from poor management. Reference is made to the species that can still be found in these hedgerows.

Also at page 24, the county's wetlands are considered. These are wetlands throughout the county, upland and lowland, and it is noted that the wetlands are poorly represented in the lowlands. However, there is in this case some specific consideration of the area covered by the AAP and it is noted at page 26

“Man-made wetlands include the important complex of habitats at the Wildlife and Wetland Trust at Washington.....This site's development was catalysed by the impending loss of one of the north east's best lowland wetlands in the early 1970's, Barmston Pond at Washington. This site amassed an enviable list of passage wading birds, favourably comparable to any site in the area, and many years later it still remains one of, if not the best single wetland site in terms of the range of waders recorded (a total of 34 different species), illustrating the attraction a wetland site can have when such habitat is in short supply. The remaining pond, whilst important in the local context, is just a remnant of what was once present.”

In this respect, I represent that the relevant provisions of the NPPF are important. Paragraph 14 of course states that, for plan-making, Council should seek opportunities to meet the development needs of their area. This surely includes the natural environment as given in Chapter 11 of the NPPF and in particular in paragraph 109.

I note the proposed policies suggested in the consultation and they are to be welcomed. However, the issue is whether they go far enough. While I have accepted in my previous letter that this may not be a “prime” site, the above entry in Birds of Durham is important. The area has also been important for farmland species and a number of perhaps unusual species have been recorded here – indeed, it has been called “Harrier Corridor” as a result of a number of records of various harriers that have been recorded, all of which are rare in the UK.

In addition, the State of Nature Report that has just been published shows an alarming decline in a number of farmland species, a need that requires urgent attention. Indeed, my own experience is that Grey Partridge has almost disappeared from the lowlands in the very recent past.

Finally, I note that the Sustainability Appraisal Report refers to various organisations including the NELEP and to the Durham Biodiversity Action Plan. It does not refer to the North East Local Nature Partnership.

As far as the DBAP is concerned, the Club considered that, because of its age, it did not properly address the current situation regarding priority birds in the county. This was discussed with the NELNP and as a result a new list of priority species for both Durham and Northumberland was drawn up earlier this year.

The AAP covers a large area to be designated for employment land. Of this, a significant area is to be reserved for green infrastructure, particularly alongside the River Don. However, I represent that it can go much further to help enhance biodiversity as part of this site. The AAP should positively seek to improve habitats for farmland birds (including the hedges mentioned above) and “blue infrastructure” by restoring Barmston Pond to its former glory. It can make provision for hirundines and swifts by providing nesting sites for them.

In my last letter, I also referred to the report of the Natural Capital Committee and the benefits such works can have on productivity and the well-being of employees. I therefore represent that such positive action as part of this AAP would not just be of even greater benefit to wildlife, it would also help the productivity of the site and improve the well-being of people working there, which in turn must assist the NHS.

On behalf of the Club, I represent that specific consideration should be given to the following issues

- a) improving the environment for Farmland birds/ground nesting species, taking into account the State of Nature Report. This should be in addition to the provision of nest boxes or swift towers which, although valuable, are perhaps tokenistic on a development of this scale.
- b) The retention and enhancement of open habitats which are currently predominant in this area. While the wooded nature of the Wear valley is mentioned in Birds of Durham, this particular area is noted more for its openness and species found here may not benefit from such habitats should they be considered, especially on a large scale.
- c) The improvement of “Blue Infrastructure” for waders & previous wetland areas. As outlined above, the Birds of Durham shows that this is an area which suits them, because of its wide open spaces and tendency to flood. In addition to Barmston Pond, there is the West Pastures site in South Tyneside which is popular with Club members. This site is north of the ‘red line’ of the IAMP boundary, but would be indirectly impacted upon by it.
- d) Provision for raptors and owls, including barn owl, mainly in recognition of the ‘harrier corridor’, running north-south through the area, as illustrated by a number of Club records over the decades/years.
- e) Special consideration of ecological connectivity (i.e. wildlife corridors), which risk being compromised by built development on this scale, including the north-south one above. This also applies to the River Don corridor itself, running east-west. Indeed, the Club represents that this is an inter-authority issue as it extends west into Gateshead, at the Follingsby South development site.

- f) The potential for brown/green roofs within the AAP should be considered to support breeding birds e.g. oystercatcher.
- g) The need for specialist management of the ecological mitigation area by a suitably qualified land manager.
- h) Consideration be given to the Priority Species of birds as now published by the NELNP

Yours faithfully

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Richard Cowen