

Sunderland City Council and South Tyneside Council

International Advanced Manufacturing Park Area Action Plan

Report of Representations

February 2017




Sunderland
City Council



South Tyneside Council

The International Advanced Manufacturing Park Report of Representations February 2017

1. This report includes copies of representations received as a result of the consultation completed in accordance with Regulation 19 of Statutory Instrument 2012 No.767 The Town and Country Planning (Local Planning) (England) Regulations 2012 (the “2012 regulations”), which consulted upon the International Advanced Manufacturing Park Area Action Plan (IAMP AAP) Publication Draft August 2016.
2. The Consultation Statement in the IAMP AAP Compliance Statement (PSD9) sets out:
 - Which bodies and persons the Council invited to make representations under Regulation 18, Regulation 19 Regulation 20; and
 - How those bodies and persons were invited to make representations.
3. The Schedule of Representations (PSD9) sets out how any representations made pursuant to Regulation 19 have been taken into account.
4. In total, 39 representations were duly made. Four representations have been subsequently withdrawn following agreed Statements of Common Ground (Appendix 2).
5. In total, 8 parties expressed that they would like to attend the examination in public to express their views. These are as follows:
 - Barrat David Wilson Homes;
 - Buckley Burnett Limited, Diane Talbot and W Gordon Proud Trust;
 - Harworth Estates;
 - NELSAM;
 - Peel, Mary;
 - Save The Trident;
 - Storey, Paul; and
 - Town End Farm Partnership.
6. Four responses were received by telephone from the following persons:
 - Mrs Quinn;
 - Mr Bob Richard;
 - Matilda Ward; and
 - Theresa Dalby.
7. These were not duly made, however the Councils have taken them into consideration.
8. This report includes representations from the following representatives:

	Reference	Representations
Appendix 1: Representations Made Pursuant to Regulation 19		
1	260916/BDWH/030	Barratt David Wilson Homes (North East)
2	220916/CCE/018	Church Commissioners for England
3	060916/COALAUTHORITY/015	Coal Authority
4	190816/CA/013	County Archaeologist
5	240916/CPRE/016	CPRE NE
6	170916/CYCLINGUK/003	Cycling UK
7	090816/DARLING/002	Darling, Brian
8	180916/DBCLUB/030	Durham Bird Club
9	071016/EA/042	Environment Agency
10	070916/HARDIE/004	Hardie, Miriam
11	260916/HARWORTHESTATES/025	Harworth Estates
12	061016/HEN/041	Highways England
13	260916/IAMPLLP/035	IAMP LLP
14	100816/LOUNTON/009	Lounton, Stephen
15	090816/MORRIS/014	Morris, Peter
16	260916/NFU/028	National Farmers Union in the North East
17	180816/NG/012	National Grid
18	290916/NATENG/038	Natural England
19	260916/NELSAM/026	NELSAM
20	210916/NEXUS/036	NEXUS
21	210916/NISSAN/032	Nissan Motor Company
22	071016/NELNP/040	North East Local Nature Partnership
23	210916/NWG/033	NWG
24	260916/PEEL/027	Peel, Mary
25	1016/ROBB/043	Robb, N
26	100816/ROBSINSON/037	Robinson, David
27	260916/STT/024	Save The Trident
28	210916/SIMPSON/20	Simpson, David
29	220916/SIMPSON/021	Simpson, Stephanie
30	240916/STOREY/001	Storey, Paul
31	051016/TEFP/039	Town End Farm Partnership
32	110816/TURNER/010	Turner, Geoff
33	260916/TWJLAF/019	Tyne and Wear Joint Local Access Forum
34	260916/WGPTPTDTBB/023	W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd.
35	170816/WANLESS/005	Wanless, Danielle
Appendix 2: Withdrawn Representations and Statements of Common Ground		
36	260916/GC/017	Gateshead Council
37	260916/HISENG/029	Historic England
38	260916/NCC/034	Newcastle City Council
39	220916/SE/022	Sport England

9. The representation reference numbers correspond to the references in the Schedule of Representations (PSD9).

Appendix 1: Representations Made Pursuant to Regulation 19

Appendix 2: Withdrawn Representations and Statements of Common Ground

Appendix 1: Representations Made Pursuant to Regulation 19

Development Plan Representation -

International Advanced Manufacturing Park Area Action Plan – Publication Draft

On behalf of Barratt David Wilson Homes (North East)

26 September 2016



I. Introduction

Spawforths have been instructed by Barratt David Wilson Homes (North East) to submit representations to the International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP) – Publication Draft consultation document.

Barratt David Wilson Homes (North East) welcomes the opportunity to contribute to the emerging IAMP AAP for Sunderland and South Tyneside and is keen to further the role of Sunderland and South Tyneside within the North East Region as a whole.

As you are aware, Barratt David Wilson Homes (North East) has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.

Barratt David Wilson Homes (North East) would like to make comments on the following topics and sections on the Growth Options:

- General Approach
- Spatial Strategy and Design
- Environment and Ecology
- IAMP AAP Boundary and new Green Belt boundary
- Land at Washington

In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is made sound.

Barratt David Wilson Homes (North East) welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public.

We trust that you will confirm that these representations are duly made and will give due consideration to these comments.

Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes.

In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This document therefore considers the content of the IAMP AAP consultation document on behalf of Barratt David Wilson Homes (North East) in light of this planning policy context.

3. IAMP AAP Publication Draft

3.1. General Approach

Barratt David Wilson Homes **support** the IAMP and the opportunity it presents to growth the local and regional economy. The AAP states in its introduction that the IAMP will:

Provide a bespoke, world class environment for the automotive supply chain and related advanced manufacturers to innovate and thrive, contributing significantly to the long-term economic success of the North East of England and the national automotive sector.

To successfully deliver the IAMP and this economic boost for the local and regional economy the supporting studies have shown that there is a real need for aspirational family housing in the area, which is not catered for at present. We have proposed land to the east of Sulgrave Road, Washington (SHLAA Site 401 plus adjacent land) as a suitable and appropriate site in meeting this need. This site is adjacent to the proposed IAMP and is able to meet the need for aspirational housing in close proximity to the intended employment base.

We are slightly concerned that the approach being proposed to the IAMP through the AAP and supporting evidence does not consider the broader picture for the area, in light of the housing and economic growth aspirations being pursued at the regional level and the Core Strategy.

The AAP appears to consider the IAMP in isolation, which we understand given the confines of the AAP boundary and those of IAMP. However, we consider that some of the policies and approaches through the AAP do not fully reflect the evidence base and could potentially inadvertently harm the prospects of land outside of the AAP boundary.

3.2. Spatial Strategy and Design

Barratt David Wilson Homes is concerned that the proposed IAMP does not fully consider this area of Sunderland spatially and consider the wider context. There is no consideration within the document for the wider context, which only considers immediate adjacent uses such as the interface with Nissan. The Masterplan Objectives (Section 4.4.1) appear to

consider the site to be located in the countryside and an area of important green open space. However, Sunderland has already coalesced with Washington to the south via Nissan and the Enterprise Zone. The area is distinctly urban fringe immediately adjoining industrial uses, the A19 dual carriageway and in close proximity to the eastern edge of Washington and western edge of Sunderland. To the south of the site there is constant built form linking Washington to Sunderland in the form of industrial development. To the north in South Tyneside lie Boldon Business Park and Follingsby Park and the former Wardley Coal Disposal Point.

This area is therefore encircled by development and being approximately 2 miles wide should not be considered countryside but an urban fringe location. Within considering this wider context the IAMP AAP should respect the potential of land adjoining its western boundaries could come forward for development in the future.

At present the AAP states:

- In the masterplan objectives the importance of enforcing the settlement break between existing built-up areas
- Policy EN1 – to incorporate a landscape buffer to incorporate the development within the surrounding countryside and provide a defensible Green Belt boundary

We are concerned that defining such a rigid policy approach could inadvertently harm the prospects of land immediately adjoining the AAP boundary which could come forward for residential development in the Local Plan and add value to the area and assist in the delivery of the economic growth aspirations.

This issue arises due to the consideration of a portion of this area in isolation for the IAMP ahead of the consideration of the wider area through the Local Plan. This disjointed approach can lead to confusion and the potential for the AAP and its supporting evidence to be misinterpreted in the consideration of potential development land in this area. In such circumstances where a portion of the Development Plan is being progressed ahead of the remaining Local Plan evidence and policies should not be able to be interpreted to apply to land beyond the AAP boundary. **At present the manner in which the policies, supporting statements and evidence are expressed it could be interpreted to**

suggest that the remaining land in this area between Washington and Sunderland adjoining the IAMP should remain open.

Proposed Change

- Amend AAP to be more reflective and respect that land outside of the AAP could come forward through the Local Plan and therefore remove elements suggesting settlement breaks and integration within a countryside setting.

3.3. Environment and Ecology

Policy EN1 – Landscape Design

Barratt David Wilson Homes is concerned that the terminology within the policy seeks to ensure that the IAMP is created and retained within a countryside setting when the scheme is already in an urban fringe location on the edge of the built up area of Sunderland and Washington and surrounded by industrial and residential development.

Policy EN1 states at Part A point iii:

Incorporate a landscape buffer (minimum 20m wide) around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt; and

The supporting text to the policy states:

The policy approach seeks to minimise the impact of the IAMP on the surrounding landscape, take opportunities to enhance landscape and provide defensible boundaries for the Green Belt to prevent development sprawl. Proposed measures to reduce the visibility of the new development and mitigate development could include the use of building materials, green roofs and walls, planting with large trees and use of buffers along development edges, to ‘soften development’ and better integrate the development with the surroundings.

The landscape policy approach focuses on the protection and enhancement of the natural and built environment, including preservation and strengthening of the special character of the environment, the separation of settlements, enhancement of the landscape experience along urban fringes, ...

We are concerned, as stated earlier, that elements of Policy ENI and supporting text and evidence portray an image of the IAMP being permanently integrated into a countryside setting and requiring and ensuring maintenance of separation of settlements. This restrictive terminology could be considered to be pre-determining the outcome of the emerging Local Plan which is yet to consider locations for growth and accompanying housing allocations. The IAMP AAP therefore should be reworded to ensure that policy approaches and evidence cannot be interpreted to relate to land beyond the AAP boundary.

Proposed Change

- Amend Policy ENI as follows:

Incorporate a landscape buffer (minimum 20m wide) around the development edges ~~to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt; and~~

- Amend supporting text as follows:

The policy approach seeks to minimise the impact of the IAMP ~~on the surrounding landscape, take opportunities to enhance landscape and provide defensible boundaries for the Green Belt to prevent development sprawl.~~ Proposed measures to reduce the visibility of the new development and mitigate development could include the use of building materials, green roofs and walls, planting with large trees and use of buffers along development edges, to ‘soften development’ and better integrate the development with the surroundings.

The landscape policy approach focuses on the protection and enhancement of the natural and built environment, including preservation and strengthening of the special character of the environment, ~~the separation of settlements,~~ enhancement of the landscape experience along urban fringes, ...

3.4. IAMP AAP boundary and new Green Belt boundary

Barratt David Wilson Homes is concerned that the IAMP AAP incorporates a large area of residual Green Belt land which is unnecessary for the implementation of the IAMP itself. The role and function of some of this residual Green Belt could be further considered through the emerging Local Plan when the consideration of housing options will be

determined. We consider it would be prudent in such circumstances where the progression of the IAMP AAP is so far ahead of the Local Plan that the IAMP AAP has a tightly drawn boundary.

We are concerned also that the new Green Belt boundary does not accord with national guidance and does not utilise clear and recognisable features. Of particular concern is the area of land around West Moor Farm where the new boundary appears to dissect several fields along an undefined transect, which appears to be a line of pylons and are not permanent features for the long term given the ability to move such objects. We believe a robust approach would be to utilise and reinforce the existing features, such as field boundaries, rather than create new ones. Furthermore, the Ecological Technical Background Paper appears to suggest that the area around West Moor Farm has some ecological interest, therefore it would be more appropriate to exclude West Moor Farm from the IAMP and associated AAP boundary.

The illustration below (Figure 1) suggests a new western boundary which utilises field boundaries and existing tracks and as such fully accords with national guidance. The AAP boundary has been similarly reduced to only incorporate that which is necessary to deliver the IAMP.

It is important that the AAP should be drafted in a manner in which the possibility for housing on land adjacent to the AAP and the IAMP can still be explored through the emerging Local Plan.

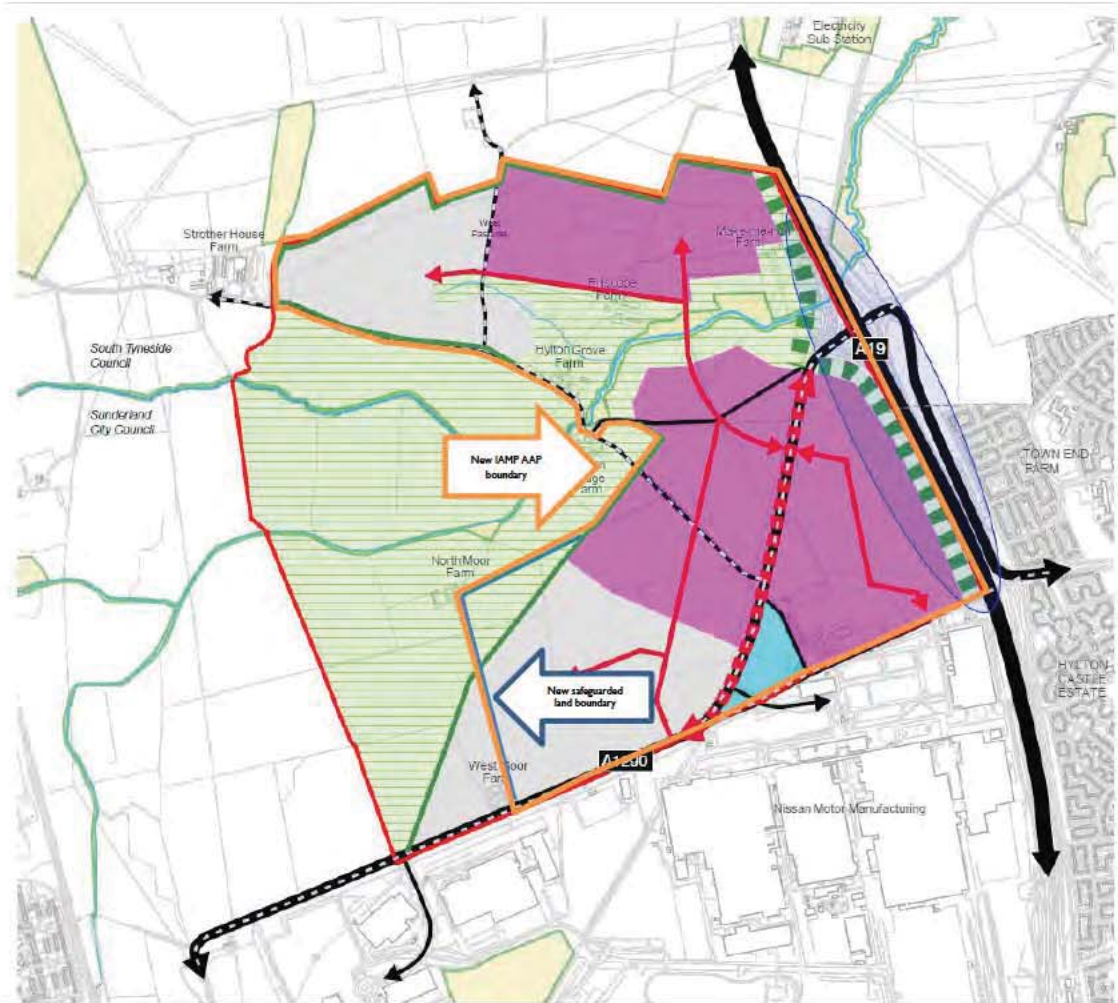


Figure 1: Suggested Amendment to IAMP and AAP boundary.

The Green Belt Review and the IAMP Green Belt and Site Selections Options Paper (November 2015) concludes that the “Green Belt separation between Washington and Sunderland has already been compromised due to the existing employment land that adjoins the two areas” and “this land represents a sustainable location within the centre of the Tyne and Wear conurbation and has been identified by the Secretary of State as having the potential to deliver a strategic development”. There are therefore, “exceptional circumstances to consider this entire area further”.



Figure 2: Assessment of Green Belt Parcels (Figure 5.2 from IAMP Green Belt and Site Selection Options Paper – Sunderland City Council and South Tyneside Council)

This is shown clearly in Figure 2 above which is extracted from the Site Selection Paper and highlights that the land on the eastern edge of Washington and the fields that border the A1290 serve little or no Green Belt purpose and can be mitigated. This conclusion is not fully reflected within the AAP as some of this land is included within the AAP boundary as Green Belt but not part of the IAMP proposals. This then leads to the question if it is shown in the IAMP AAP as Green Belt can it be considered for residential when the wider plan is reviewed, particularly as the Green Belt Review considered the land serves little or no Green Belt purpose and its release in the future would complement the IAMP proposals. We have therefore proposed some suggested amendments to the AAP boundary to ensure land to the east of Washington is able to be fully considered through the Local Plan Review without risk of transcending into the AAP boundary.

The AAP boundary should therefore be tightly drawn and not include land which is unnecessary for IAMP, as this would allow for the purpose of that land to be considered through the emerging Local Plan which is considering housing land allocations.

The proposals for the IAMP on land adjacent to Nissan are a step change in aspirational economic growth and to truly capture its value for the Sunderland economy associated aspirational housing should be planned in the locality. The Arup report on housing for IAMP

identifies that the scheme will generate the need for at least an additional 523 new homes but could be up to above 2,600 new homes.

We believe that land in Washington adjacent to the IAMP proposals is the most appropriate location for new housing related to the proposals. This approach reflects the Green Belt Review which concludes the land adjacent to that which is now being proposed for the IAMP does not perform a strong Green Belt function and is able to be removed from the Green Belt. The location of aspirational family housing adjacent to the IAMP would benefit Sunderland and the wider economy with good linkages to the south and north and its proximity to existing and proposed employment sites. There is the opportunity with the IAMP to create a sustainable urban extension delivering hi-tec jobs and aspirational family housing. There should therefore be a focus for growth towards Washington to take advantage of the IAMP proposals.

Proposed Change

- Amend the IAMP and AAP boundary per the plan above.

4. Land at Washington

Barratt David Wilson Homes would like to highlight briefly the benefits of the Land East of Sulgrave Road, Washington (SHLAA Site 401 plus adjacent land) and that it should be identified for new housing. Full details have been submitted previously as part of the Growth Options consultation.

We consider that a new sustainable urban extension could be created to the east of Washington. We believe the site to be a sustainable location for residential development which can assist in the delivery of a sustainable community providing housing in close proximity to existing and major new employment.

We consider that the site is available, suitable and achievable and therefore in accordance with the Framework is deliverable and able to come forward in the short term. We are preparing a masterplan and Vision which will be submitted in due course and demonstrate the deliverability of the proposals.

The deliverability and benefits of Land East of Sulgrave Road, Washington is as follows:

Overview of the proposals

The Plan below shows land to the East of Sulgrave Road, Washington (SHLAA site 401 and adjacent land), which could create a sustainable urban extension to Washington. The site is in close proximity to the proposed IAMP and lies adjacent to Nissan and the Enterprise Zone. The site has the potential to create aspirational family housing which workers at the proposed IAMP aspire to and the Strategic Housing Market Assessment shows is deficient in the area. The proposals and its interlinkages with the adjacent employment have the potential to create a sustainable mixed community with new aspirational housing in close proximity to hi-tec highly skilled employment.

The site directly adjoins the A1290, which provides good accessibility to the A19 and A1(M)/A194(M) and A1231. The site is already well connected by existing roads, tracks and public footpaths and public transport, but the proposals have the potential to enhance provision.

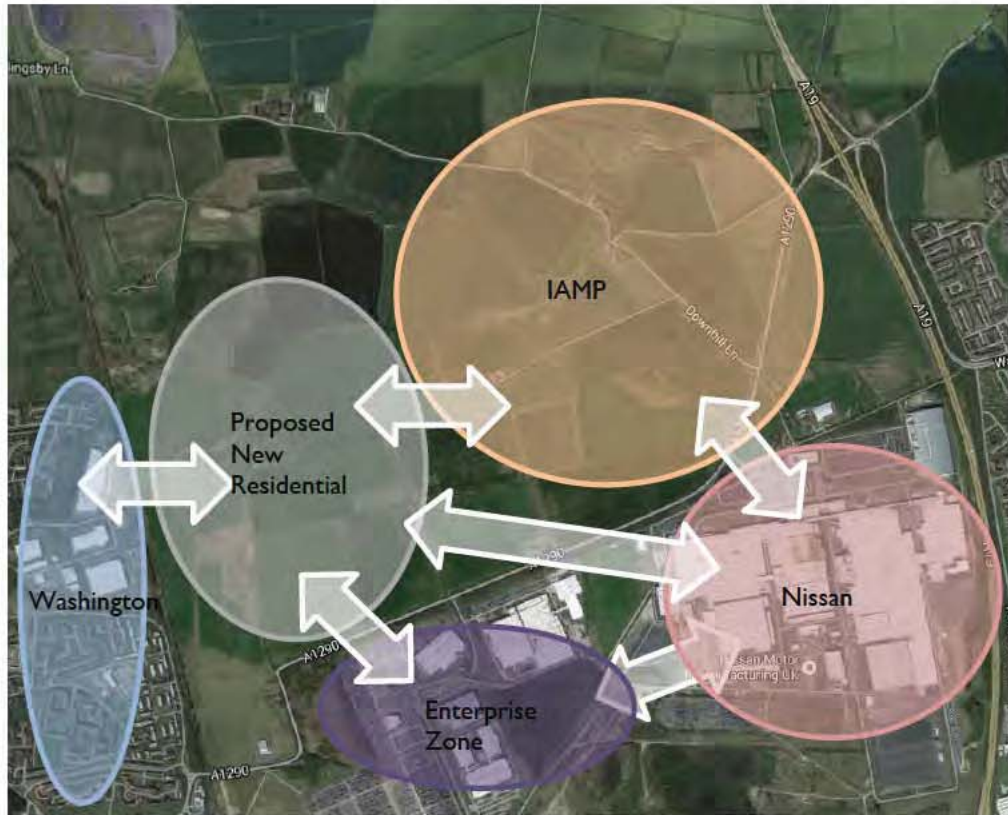


Figure 3: Proposed Residential Opportunity adjacent to IAMP

Benefits

The development of the site would provide significant benefits:

- The site is suitable for housing.
- The proposal will deliver a high quality housing scheme adjacent to the proposed IAMP.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area.
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The site is within a sustainable location situated in close proximity to facilities and services and can also enhance public transport provision.
- The proposal will deliver public open space.

We believe the site would provide a unique opportunity to create sustainable urban extension that captures full opportunity of the IAMP and catalysing the economic growth

effect by meeting the needs of Sunderland and creating much needed aspirational family housing to attract employees and managers to the proposed new IAMP. The site lies adjacent to IAMP, Nissan and the Enterprise Zone and has the potential to create a new community in close proximity to major employment. Therefore this site provides a unique opportunity in a sustainable location.

22 September 2016

220916/CCE/018



Ms Sara Dunlop



Patrick Moseley



Dear Sara

**The Church Commissioners for England
International Advanced Manufacturing Park (IAMP) Consultation Response**

We are instructed by the Church Commissioners for England (the Commissioners) to respond to the IAMP Area Action Plan Publication Draft Consultation. We note that the proposed IAMP is an ambitious initiative intended to provide a world-class environment for high tech industries and advanced manufacturing businesses, in the hope of creating more than 5,200 new jobs by 2027 in innovative industries.

The Commissioners have extensive land and minerals holdings in the wider South Tyneside and Sunderland City Council areas and a significant portion of their land and minerals ownership has been included in the IAMP proposal, as both development and mitigation areas. The Commissioners support and welcome the general concept and location of the proposal but have some concerns and reservations about the detail contained within the Draft.

Within the Draft, there is little evidence to support both the extent of development area and, particularly the extent of mitigation area. Given the amount of land included within the site boundary, there is a low proportion of area outlined for development with significant mitigation proposed, which appears to be in excess of that ordinarily required for the extent of development outlined. We would welcome understanding the evidence base to support these proposals further.

Our final concern relates to the delivery of the scheme from a landowner's perspective. There are a number of different landowners within the proposed site and, in our experience, a major part of delivering any large development site is in the land assembly. The Draft offers very little detail as to how South Tyneside and Sunderland City propose to achieve this and there has been limited consultation with the principle landowners to date. We would welcome more detailed discussions with both Councils as to their proposals to deliver the land for the scheme and are keen to work positively and proactively with both authorities to see the delivery of the IAMP proposals.

Yours sincerely



Patrick Moseley MRICS
Director - Development





The Coal
Authority

060916/COALAUTHORITY/015

International Advanced Manufacturing Park - Area Action Plan (Publication Draft)

Consultation Deadline – 26 September 2016

[Redacted content]

Date of Response
6 September 2016

Thank you for consulting The Coal Authority on the above document.

Having reviewed the document, I confirm that we have no specific comments to make at this stage.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Yours sincerely

[Redacted signature]

Mark Harrison *BA(Hons), DipTP, LLM, MInstLM, MRTPI*
Principal Manager

From: Morrison, Jennifer
Sent: 19 August 2016 11:31
To: IAMP
Subject: International Advanced Manufacturing Park Area Action Plan

Dear Sir/Madam,

Thank you for consulting the County Archaeologist with regard to the International Advanced Manufacturing Park for the North East Region Draft Area Action Plan.

I am disappointed that the supporting documents do not include a report on the historic environment. Northern Archaeological Associates produced a historic environment desk based assessment (for a larger area) in 2014 for Mott MacDonald (which I have a copy of). CFA Archaeology was been appointed to do a scoping report for the AAP in June 2016. I would be interested in seeing CFA Archaeology's report.

I am pleased to see that 135 hectares of land will be retained and enhanced as green open space.

The site includes a grade II listed building (the late 18th or early 19th century Hylton Bridge). I think that this should be shown on the policies map. I am pleased to see that the bridge lies in an area which is not proposed for development.

The 2014 historic environment assessment concludes that the site contains:

- a medieval settlement and ridge and furrow earthworks at Elliscope Farm
- grade II listed Hylton Bridge
- Ridge and furrow earthworks
- A cropmark possibly representing a rectilinear enclosure
- late 18th or early 19th century farms (Hylton Bridge, Hylton Grove, Elliscope and Make-Me Rich, West Moor Farm, The White House)
- a late 18th or early 19th century public house (Three Horse Shoes)
- the site of a smithy (Smiths Farm is shown on an 1840s estate map of Hylton)
- Severn Houses (Hillthorn Terrace), a late 19th century speculative development
- the former Stanhope and Tyne Railway (opened in 1834, out of use 1984), now under the A1290
- the Personnel Accommodation (the North East Air Museum) and site of the Decontamination Unit for Usworth Airfield.
- Hangar from RAF Usworth re-located at the North East Aircraft Museum
- Re-located picket Hamilton fort at Aircraft Museum
- Buildings of former military use at Aircraft Museum

- Circular cropmark in the bowling green next to Aircraft Museum (site of air raid shelter)
- a mixture of arable and pasture fields, defined by mature hedgerows and modern fencing. The field system probably dates from the 17th century enclosure.

As an undeveloped area of greenfield, the proposed development site also has the potential to contain as-yet unknown buried archaeological features (such as prehistoric or Roman remains).

A programme of archaeological fieldwork will be required, in advance of a planning application being submitted. This would include a site walkover (to identify ridge and furrow earthworks, fields suitable for fieldwalking, post medieval enclosure etc), geophysical survey, fieldwalking survey of any ploughed fields, building recording and evaluation trial trenching. I can provide specifications for the archaeological work when required.

The setting of nearby designated heritage assets, and views to and from those assets, will need to be considered in a Heritage Statement.

I presume that a new home will be found for the North East Aircraft Museum? The museum holds an irreplaceable collection of military and wartime artefacts, plus the aircraft themselves. There is a WW2 picket Hamilton fort in the grounds of the museum.

I trust that you will find the above information helpful.

Yours sincerely,

Jennifer Morrison BA (Hons), MA, MCI(A)

Tyne and Wear Archaeology Officer

Newcastle City Council

Development Management

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Website: www.newcastle.gov.uk/hes

On-line Tyne and Wear Historic Environment Record: www.twsitelines.info

Any statements, views or opinions within this e-mail are those of the author and are informal; they do not prejudice any decision that may be later taken by the Local Planning Authority.



Campaign to Protect
Rural England
North East

Administrator
Mrs Gillan Gibson

[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

Working for a beautiful and
living countryside

Project Office
International Advanced Manufacturing Park
IAMP Area Action Plan (August 2016)

[Redacted]
[Redacted]
[Redacted]
[Redacted]

24th September 2016

Dear Sir,

**IAMP: International Advanced Manufacturing Park for the NE Region
Area Action Plan consultation**

Thank you for the opportunity to comment on the above consultation.

Of particular concern to CPRE is the IAMP requires deletion of a significant area of Green Belt. Nationally, CPRE is the only body that seeks to protect the Green Belt and so we look at proposed deletions with great care. In addition, we note that National Planning Policy Framework paragraph 83 states *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”* We accept that this Area Action Plan is part of the Local Plan process for both Sunderland City Council and South Tyneside Council but have considered this proposal with care to see if “exceptional circumstances” are in fact made out.

Consequently we have taken particular notice of the “IAMP AAP: Exceptional Circumstances for Releasing Land from the Green Belt: Technical Background Report”.

We note this document presents a case for “exceptional circumstances”, in particular:

- The success of Nissan and other advanced manufacturing businesses and their associated businesses in bringing employment and economic success to the region, plus the projected benefits;
- The requirements of those businesses, in particular proximity of businesses, the interconnectedness of businesses; and excellent transport links;
- The analysis of possible alternative sites, none of which are adjudged to meet all the necessary criteria.

Patron
Her Majesty The Queen

President
Emma Bridgewater

Chief Executive
Shaun Spiers

Registered charity number
1089685



We also note that in the documentation for the AAP:

- there is repeated mention of the land being available for only specialised manufacturing and its supporting businesses;
- there will be a design guide for buildings. Design will be critical, especially the “mass” and colour of the buildings (including the roofs). The heights of buildings should be constrained to maximum permitted heights, perhaps similar to the heights of the Nissan plant and the buildings on Boldon Business Park, so that so far as is possible in the circumstances they “settle” into the landscape and do not protrude unduly on the landscape. Taller buildings than this must be avoided. With regard to colour, buildings should be of colours which help them blend into the landscape, not stick out;
- the protection and enhancement of the River Don corridor and wildlife in general both on the site and beyond.

In light of the above CPRE accepts, subject to below, that a case for “exceptional circumstances” exists in this case and so will not be opposing the creation of the IAMP.

However, the IAMP is premised on Nissan remaining in Sunderland. Whilst there are many indicators that it will do so and in fact is expected to expand production, we note the recent comments from the Japanese at the G20 summit with regard to the Brexit negotiations and as a result believe it cannot be ruled out that Nissan may reconsider its options and close the Sunderland plant. Should this occur we consider the need for the IAMP will cease and the land must be retained within the Green Belt. The remaining specialist and advanced manufacturing business can be directed onto the land vacated by Nissan which is already allocated for employment use.

We trust the above will be considered at the appropriate time.

Yours faithfully



Gillan Gibson
Administrator
CPRE North East

Patron
Her Majesty The Queen

President
Emma Bridgewater

Chief Executive
Shaun Spiers

Registered charity number
1089685

Q1: Personal Details

- Title Ms
- First Name Heather
- Last Name Evans

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp-www.sunderland.gov.uk/iamp

Policy T2 Walking, Cycling and Horse Riding

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- Legal – complies with the law
- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Yes

Q5: If no, please choose from the options below why do you not support the policy/paragraph?

Please use this space to add any further comments.

Very pleased to see that motor vehicles are to be restricted on Follingsby Lane.

Q6: What would you like to happen?

Respondent skipped this question

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Respondent skipped this question

Q8: If so, why do you feel this is necessary? (Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

Respondent skipped this question

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft is adopted

Q1: Personal Details

- **Title**Mr
- **First Name**Brian
- **Last Name**Darling

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyndeside.gov.uk/iamp - www.sunderland.gov.uk/iamp

Respondent skipped this question

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

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- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Respondent skipped this question

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective

Please use this space to add any further comments. Firstly, I should be grateful if you would advise me on the cost of the Infrastructure Works for this scheme. (I do believe the project is a wonderful idea building on the back of Nissan's success in Washington over the last 20 or so years, but the most important issue in any grand scheme in my opinion is that the project has to be achievable. I do not believe this project sadly is achievable) It is widely acknowledged that Industrial Development, and to a lesser extent, Commercial Development in the North East is unviable in financial terms. What makes this scheme different from any other in the North East. Will you be relying on Grant Aid to make it happen. What happens if Nissan decide to relocate from Washington to a site owned by Renault in France in 5 to 10 years time as a result of Brexit. Where does that leave the scheme. I have many other questions but.....

Q6: What would you like to happen?

Respondent skipped this question

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Respondent skipped this question

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

Respondent skipped this question

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

Respondent skipped this question

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████

Date9 August 2016



Durham Bird Club

Registered Charity No 515101

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

18 September 2016

[REDACTED]

Project Office,
Room 3.8,

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

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

██████████

Richard Cowen

City of Sunderland
Development & Regeneration
PO Box 102
Sunderland
Tyne and Wear
SR2 7DN

Our ref: DN/2006/000167/AP-03/SB1-L01

Your ref:

Date: 07 October 2016

Dear Sir/Madam

**International Advanced Manufacturing Park (IAMP) Area Action Plan
Submission Draft**

Thank you for your consultation on the Area Action Plan Publication Draft which we received August 2016. Having reviewed the publication document we have the following comments to make:

2.7

We support the IAMP vision and Objectives, in particular objectives 9, 20 and 13. As the River Don runs through the development the IAMP core principals should utilise the river as an asset and not a constraint to development.

4.4.1

We support the masterplan objectives and the necessity to protect the river don corridor.

The Don waterbody is classified as having poor overall and ecological status under the Water Framework Directive (WFD) and as heavily modified. As a result the waterbody cannot meet good ecological condition under WFD due to the amount of structural changes. There has been channelization and straightening within the urban areas and ditching in rural areas which has disconnected the river from the floodplain.

In partnership with South Tyneside Council, Sunderland City Council, Local Nature Partnership and other stakeholders we are working towards delivering a vision for the River Don. The vision is to create a healthy and biodiverse catchment that is valued and enjoyed, contributing to the economic and social well-being of local communities. The catchment will provide a high quality environment that attracts new business and facilitates economic growth.

On this basis, we request an objective is included for the river restoration of the Don, specifically to improve water quality and geomorphology.

We have recently commissioned the River Restoration Centre to carry out a study which will provide river restoration recommendations/options for the Don, including the IAMP site. This study has commenced and initial outputs can be made available for consideration within AAP and forthcoming Development Consent Order (DCO).

Environment Agency

www.gov.uk/environment-agency

Cont/d..

We agree with surface level strategy for drainage objective and would advocate the use of SUDs and its guiding principles at every opportunity.

4.4.2

Policy D1 – Masterplan Design, we support the design principles however would recommend that point iv. could be amended to include a water quality element. This is supported by NPPF and the Water Framework Directive (WFD) - *Drainage infrastructure to be accommodated within the street network with sustainable urban drainage systems (SuDS) placed to enable effective water management and improve water quality*. This is of particular importance given poor water quality accounts in part for the Don's failing WFD status.

5.1 Highway Infrastructure

We would advise that the new bridge over the River Don as referenced in point iii. will require a flood activity permit. This will assess the impact on flood storage and conveyance of floods water along with construction methodology. We would advise consulting us as early as possible in the design process of the bridge.

5.6 Flood Risk and Drainage

We support the inclusion of policy IN2. However we would like to see an additional point within Policy IN2 to include the requirement help alleviate flood risk to downstream communities. This is supported in paragraph 100 of the NPPF, using opportunities offered by new development to reduce the cause and impacts of flooding.

We would like advise that the new bridge over the River Don will require a flood activity permit. This will assess the construction of the bridge, methodology and design. You can find further details by following the link below:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

We would recommend consulting us as early stage in the design process of the bridge and recommend that the soffit of the bridge would be above the 100 year plus climate change level.

We welcome the requirement of a detailed Flood Risk Assessment (FRA) to be prepared and submitted along with the DCO application. Further to this policy any flood risk modelling work to be undertaken will require verification from the Environment Agency.

While we would agree that the main uses of the development are categorised as less vulnerable, however under the PPG there are proposals for more vulnerable development (nurseries) and essential infrastructure (road bridges) that will require more robust assessments to be undertaken.

6.2 Ecology

We support the inclusion of policy EN2, however we would request a further objective of improving the WFD status in line with WFD objectives for the Don.

The policy specifies the requirement for an Ecological Impact Assessment as part of the EIA, which we support. To further inform this we request reference is made to the requirement for a WFD Compliance Assessment to support any future application.

6.3 Green Infrastructure

We welcome policy EN3 and in particular point i. To incorporate a minimum 50m wide buffer along the River Don linking with the wider area Green Infrastructure Corridor.

With IAMP and the nearby Follingsby development there is an opportunity to enhance habitats, habitat connectivity and provide opportunities to improve water quality and reduce flood risk. The current mitigation zone within the IAMP site along the River Don extends to the edge of the western site boundary, we request that this is amended to extended further along the River Don and connect to the proposed Follingsby development upstream where there are plans for further ecological mitigation along the Don. In doing so this will maximise the environmental benefits for these developments and help realise the River Restoration ambitions.

Table 1: Infrastructure Delivery Schedule

With regards to the River channel improvements as scheduled in Table 1, ref 14 - we support river channel improvements and consider these are informed by the River Restoration Study currently being undertaken by the River Restoration Centre.

Table 2: AAP Monitoring Framework

We support the AAP objectives, we would advise however that objective 12 is expanded to include reference to improving flood alleviation to downstream communities.

We would recommend that the water quality and habitat connectivity element to objective 12 could be a separate objective with the inclusion of achieving WFD objectives as highlighted in the ecology paragraph above.

Monitoring Framework

A target/indicator of policy EN2 could be that there is no deterioration in the River Dons WFD status.

Please do not hesitate to contact me should you wish to discuss any of these issues further.

Yours faithfully

Cameron Sked
Technical Specialist - Sustainable Places Team

████████████████████
████████████████████
██

Q1: Personal Details

- Title Miss
- First Name Miriam
- Last Name Hardie

█ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp-www.sunderland.gov.uk/iamp

Paragraph 2.5, 3.61, 4.22 and other paragraphs

Policy IAMP Publication Draft Action Plan August 2016

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

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- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments.

The report concludes that the area around A19/Testos roundabout is suitable for development. However in a recent public consultation as part of South Tyneside Council's Local Plan for Housing this area was deemed unsuitable for development by STC's own Planning Office who took three years to review land in the borough. The area is green belt. Please explain how the councils have determined that the A19/Testos roundabout is now suitable for development. STC used nine consistent factors within their Strategic Land Review including designated Green Belt site. What factors other than availability of City Deal Funding were considered for the IAMP assessment. At the public consultation meeting I attended on 17 August 2016, I was informed 2018 would be the earliest development would commence. Brexit and other factors might mean that the required investment and companies are not secured for the IAMP. Does this mean the Councils, if approval is given for the IAMP could have a back door to use this site for housing instead even though the land review said the area was not suitable for housing development in a separate exercise.

Q6: What would you like to happen?

Amend policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text.

The Councils or the management consultancy employed for this exercise should amend accordingly.

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

No

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

Respondent skipped this question

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)


Date 17/09/16

Q1: Personal Details

- TitleMr
- First NameEddie
- Last NamePeat



Q2: Agent's Details (only required if you're representing a third party)If this question does not apply to you, please move on to question 3.

- TitleMrs
- First NameKatie
- Last NameWood
- OrganisationR & K Wood Planning LLP



Q3: Please give the number or name of the Paragraph or Policy your comment relates to.For each policy that you would like to comment on, an individual form will need to be completed.You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp- www.sunderland.gov.uk/iamp
ParagraphParagraph 4.41

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:
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• Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
• Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments.It is noted that improving access and connectivity includes three objectives. They include the need to promote new highways connections to 'optimise access to the wider area'. The sole use of Follingsby Lane by bus and cycleway will fail to promote new highways connections to the wider area. In particular it will fail to take advantage of the opportunity to link existing industrial and distribution activities to the west of the site, focused on Follingsby Lane and the Wardley site, to the proposed IAMP. It is noted in the TP in paragraphs 2.87, and the introductory paragraphs, that a study has been done on the metro and the bus connections to the area however this is not included in this public consultation. We therefore have been unable to see and comment on this background evidence paper which may contain further justification and evidence

for Follingsby Lane simply being used as a bus route. It is also noted that all of the proposed routes and all of the proposed connections to the existing Metro Line (paragraphs 2.8.8 and 2.8.9) make reference to Wardley and I can only assume that this is my clients land. Again as the evidence paper has not been included in the consultation we are not able to make any comments on this but would like to have sight of this as soon as possible to continue discussions with the relevant Authorities.

Q6: What would you like to happen?

Delete policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text. It is considered that the paragraph and policies that seek to restrict the use of Follingsby Lane should be reconsidered as it is not considered to be beneficial to the overall development of the IAMP

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

To discuss this matter with the Inspector

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

When the Inspector's Report is published

When the IAMP Area Action Plan Publication Draft is adopted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

[Redacted signature]

Date 26-9-16

Q1: Personal Details

• Title Mr

• First Name Eddie

• Last Name Peat

[Redacted address]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

• Title Mrs

• First Name Katie

• Last Name Wood

• Organisation R & K Wood Planning LLP

[Redacted address]

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp-www.sunderland.gov.uk/iamp
Policy T1

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- Legal – complies with the law
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- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments. Policy T1 identifies specific highway infrastructure and improvements that will occur within the area. Policy T1A (iii) includes a new bridge over the River Don to allow access to the northern part of the IAMP and this is supported. Policy T1A (iv) includes for new distributor roads within the IAMP to accommodate the movement of all users. If Follingsby Lane is to be downgraded for bus and cycle use only, then such distributors roads must include a road link within the IAMP to Follingsby Lane and specifically the industrial and distribution uses to the west of the site. Please see my other comments on behalf of Harworth Estates relating to the downgrading of Follingsby Lane.

Q6: What would you like to happen?

Amend policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text. It is suggesting that the wording of policy T1A (iv) is altered as follows: New distributor roads within the IAMP to accommodate the movement of all users ... (new text as follows) ... in the IAMP and area but also to facilitate connections to existing and proposed commercial areas outside the IAMP. This will ensure that the emphasis is placed on ensuring the IAMP is well connected to existing commercial and industrial uses in the area.

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary? (Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

To discuss this matter further with the Inspector

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

When the Inspector's Report is published

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

[Redacted]

Date 26-9-16

Q1: Personal Details

• Title Mr

• First Name Eddie

• Last Name Peat

[Redacted]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

• Title Mrs

• First Name Katie

• Last Name Wood

• Organisation R & K Wood Planning LLP

[Redacted]

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp- www.sunderland.gov.uk/iamp

• Paragraph Table 1 Page 34

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- Effective - the plan should be deliverable over its period and based on effective joint

working on cross-boundary strategic priorities;• Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

- No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments.My clients, Harworth Estate, believe that there must be vehicular access for private car and HGV's, connecting the eastern side of the IAMP to the existing industrial and commercial facilities at Follingsby Industrial Park and Wardley. It is acknowledged that Follingsby Lane may not wide enough to be this link however it should be upgraded or replaced as part of the infrastructure work required to facilitate the IAMP. This work should be done at the start of the project (2019) rather than being left to come forward at a later stage. Table 1, reference point 6, states that the proposed scheme will include for Follingsby Lane to become a bus route and cycleway only. It is assumed that this will be part of the main infrastructure works, programmed to start in 2019. The Transport Technical Background Paper (TP), which forms one of the background documents for this Area Action Plan (AAP), identifies that Follingsby Lane is not suitable as a viable means of access to the IAMP due to the current nature of the road and the bridge over the River Don. It is noted that in paragraph 3.5.1 of the TP a concern has been raised that it would provide an attractive through route for traffic from the A194 to the A19 leading to unrelated IAMP traffic causing congestion locally. Follingsby Lane, at its western end, already provides access to the Follingsby Lane Industrial Estate, and a proposed extension to this Estate has been identified in the Newcastle/Gateshead UDP, as well as the existing consented Wardley site. The Wardley site, which is owned by my clients Harworth Estates, is identified in South Tyneside's latest consultation draft of the Local Plan as a potential employment site. Therefore, to limit vehicular traffic to buses only along the full length of Follingsby Lane will have a direct negative impact on these existing and proposed sites. I therefore assume that the proposal is to restrict the use of Follingsby Lane to buses only at the point at which it enters the IAMP area. The concern that has been noted in the TP that the existing Follingsby Lane may become a back route between the A194 and A19; this is not considered realistic. Heavy goods wagons cannot use Follingsby Lane at the moment because of the weight restriction on the bridge. I am not aware that the Lane has not been used intensively as a link between these two roads and there is no reason to believe why it should do in the future. It is noted that the overall masterplan for the site does include new proposed key roads. These key roads will potentially result in a road linkage leading from the IAMP to Follingsby Lane in the vicinity of Strother House Farm. If the use of Follingsby Lane is simply restricted to buses and it is replaced by a new distributor road, then Harworth Estates would support such a proposal. However, if Follingsby Lane is closed to vehicular traffic, without any replacement then this cannot be supported. Not providing a link between the existing Follingsby Estate and the IAMP fails to acknowledge the interrelationship between these two important industrial areas. The IAMP is identified as concentrating on automotive and advanced manufacturing sectors for production, supply chain and distribution activities (Policy S3) and specifically any other uses need to have a link to the IAMP or not be detrimental to the operation or principle of its use (Policy S3B). Therefore, other B2 and B8 industrial developments which may benefit from being in such an area may need to be located on sites that are not within the IAMP but are located in close proximity. This could include energy uses or waste uses that have a direct relationship to the IAMP by taking waste or providing power but are better located away outside the IAMP itself. Therefore, the further development of Follingsby and the potential development of Wardley offers an ideal opportunity to provide commercial floor space for a whole range of activities that are not directly related to the IAMP but will benefit from direct linkages to the site. To restrict the vehicular access between the existing sites and the IAMP will result in two isolated commercial developments and this cannot be viewed as 'positive planning'. Therefore, either the upgrade or replacement of Follingsby Lane must be included as part of this Area Action Plan and it must be included within the first phase of the infrastructure works.

Q6: What would you like to happen?

Amend policy or paragraph?

Delete policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text.Our view is that Table 1, reference point 6, should be amended to include the upgrade or replacement of Follingsby Lane in order to provide the vehicular linkages between the existing commercial and industrial sites and the IAMP.

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

In order to discuss this matter with the Inspector to emphasis the importance of such a vehicular route

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draftis adopted

When the Inspector's Report is published

When the IAMP Area Action Plan Publication Draft has been submitted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████

Date26-9-16

Our ref: IAMP Pub Draft
Your ref:

Ian Radley
Highways England

South Tyneside Council



Date 6 October 2016

F.A.O. Sara Dunlop

Dear Sara

SOUTH TYNESIDE/SUNDERLAND INTERNATIONAL ADVANCED MANUFACTURING PARK AREA ACTION PLAN PUBLICATION DRAFT, AUGUST 2016

Highways England welcomes the opportunity to provide comments on the International Advanced Manufacturing Park Area Action Plan (AAP) Publication Draft and have undertaken a review of the document in accordance with our responsibilities and aims. Our review has focussed on the policies, development proposals and transport infrastructure improvements proposed within the AAP and the evidence base accompanying the plan. This has included a review of the Transport Technical Background Report (August 2016) and a subsequent review of the detailed evidence base that has informed this report, including:

- Base Modelling Approach - JMP Technical Note, July 2015
- Future Year Modelling – JMP Technical Note, July 2015
- Multi-Modal Trip Generation Assessment – JMP Technical Note, November 2015
- IAMP Vehicle Trip Distribution – JMP Technical Note, November 2015
- Local Model Validation Report – JMP Report, December 2015
- Washington Road Bridge Option Testing – JMP Technical Note, December 2015
- Existing Network Trigger Point Assessment – JMP Technical Note, April 2016

The need to appropriately plan for development impacts and supporting infrastructure and mitigation measures as part of the plan making process is supported by DfT Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development, which states that: *'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage'*.

We therefore welcome that future highways infrastructure requirements have been identified within Policy T1, which also specifically recognises how the IAMP will connect to and integrate with Highways England's A19 improvements, including the Downhill Lane and Testos

Junctions. As identified in Part B of the Policy, the IAMP DCO application will need to be supported by a phasing strategy and transport assessment to demonstrate the resulting implications for the SRN, which will enable Highways England to have the opportunity to review the application once it has been submitted.

Part C of the policy can also be particularly supported as it ensures that development will not be supported where it would adversely impact on the safe and efficient operation of the SRN or would compromise the delivery of Highways England's improvements to the network. Whilst this should provide sufficient comfort to Highways England that ultimately development will be appropriate and capable of being accommodated on the SRN without severe implications for network operation or safety, there is still the need to fully understand what these impacts are likely to be.

As highlighted above, we have undertaken a review of the supporting transport evidence base documents that underpin the transport infrastructure provisions within the AAP and our review has considered the methodology and conclusions of these assessments, which establish these potential impacts and provide support for the future infrastructure improvements that will be required.

Whilst we have a number of comments on the evidence that has been prepared to date, the conclusions are not considered to be fundamental to the soundness of the AAP. However, whilst we consider that ultimately the schemes at the Downhill Lane and Testos Junctions will be sufficient to support the quantum of development aspired to in the AAP, there is still the need to understand how future development will be phased alongside these planned improvements. We therefore look forward to our continued co-operation on the AAP and the preparation of the phasing strategy and transport assessment that will be submitted with the DCO application.

I trust this response will be helpful. If, however, you require any further information, please do not hesitate to contact me. I look forward to receiving confirmation that our comments have been received in due course.

Yours sincerely,

[REDACTED]
[REDACTED]
Ian Radley
Asset Manager
Yorkshire & North East
[REDACTED]





Iain Fairlamb
Head of Planning & Regeneration
Sunderland City Council

www.iampnortheast.co.uk

Date: 26th September 2016
Our ref: AAF/DC/rd
Your ref:

Dear Sir,

IAMP Area Action Plan – Publication Draft Consultation

IAMP LLP is a limited liability partnership established by the Sunderland City Council and South Tyneside Council to promote and develop the International Advanced Manufacturing Park to the north of the existing Nissan plant.

The International Advanced Manufacturing Park (IAMP) will host new and expanding automotive, energy, low carbon, logistics and offshore manufacturing businesses together with associated and ancillary uses on land to the north of the existing Nissan site, to the west of the A19 and to the south of the A184.

In summary, it is envisaged that the IAMP will deliver:

- A high quality, international advanced manufacturing park of up to 170 ha.
- Approximately 260,000sq m of floorspace over the site with necessary and related infrastructure, services and ancillary development and mitigation.
- Approximately 5,200 direct new jobs.

Given the significance of the project to the UK economy, IAMP LLP is working closely with the Government, Nissan and other key stakeholders all of whom support the IAMP project. The IAMP remains critical to the continued success of the north east economy and the UK automotive sector.

IAMP LLP welcomes this opportunity to provide comments on the August 2016 IAMP Area Action Plan Publication draft and supporting evidence base documents which have been published for consultation by Sunderland City Council and South Tyneside Council.

This letter seeks to provide confirmation of IAMP LLP's aspirations for the IAMP; an update on the project; and responses on a number of specific points in the Publication draft Area Action Plan and supporting evidence.

Project Update

As you have acknowledged in the AAP, the IAMP is in planning terms, a nationally significant infrastructure project (NSIP) following its designation as such in September 2015 by the Secretary of State for Communities and Local Government.

We will therefore in due course be submitting a Development Consent Order (DCO) application for the International Advanced Manufacturing Park (IAMP) under the Planning Act 2008 in order to authorise the Project.

We propose to submit the DCO to the Planning Inspectorate in spring 2017. In advance of this, two rounds of consultation will be undertaken in late October 2016 and January 2017 both with the local community and prescribed consultees (referred to as Section 47 and Section 42 consultation in the Planning Act 2008).

IAMP LLP is committed to working with the Councils during the pre-application stage of the DCO process. In this regard, we are consulting with the Councils on the Statement of Community Consultation (SoCC) which sets out how it proposes to consult people living in the vicinity of the Project under section 47(2) of the Planning Act 2008. IAMP LLP is committed to an ongoing process of formal and informal engagement with the Councils and looks forward to working closely with them on the project.

The IAMP is classed as an Environmental Impact Assessment (EIA) development. IAMP LLP has recently submitted an Environmental Impact Assessment Scoping Report to the Planning Inspectorate in respect of the project and anticipates the Scoping Opinion being issued in mid-October 2016. In addition, a Preliminary Environmental Information report is currently being prepared in order to be available during the first stage of pre-application consultation on the DCO in late October. At present we consider that the Publication Draft Area Action Plan and supporting background papers accurately reflect the currently available environmental information. However, should relevant additional information become available then we would seek to make this available to the Councils in order to inform the Submission draft version of the AAP.

In respect of highways matters, IAMP LLP is continuing discussions with Highways England and the Councils on the proposed package of highway improvements which have been identified as being required both to mitigate the impact of the IAMP and to address some of the existing highway capacity issues in the area. Detailed design work and discussions are ongoing on these matters and in particular the proposed improvements to the Downhill Lane junction which would improve access to the

IAMP from the A19. We understand that Highways England currently plan to consult on their own DCO application in Autumn 2016. At the present time, IAMP LLP are content that policy T1 provides an appropriate framework in relation to highways matters.

Response to the Area Action Plan consultation documents

Overview

As outlined above the IAMP was designated as an NSIP by the Secretary of State in September 2015, and thus must be consented through a DCO. The Government has prepared a series of National Policy Statements (NPS) which set out the policy context for certain NSIP categories including energy, transport and waste. There is not currently an NPS for business and commercial projects. The AAP will establish a planning policy framework for the IAMP through the local plan process and will be a material consideration in the determination of the DCO application. IAMP LLP therefore welcomes the Councils' commitment to progress the Area Action Plan given the important support, in planning policy terms, that it will give to the project.

IAMP LLP believes that the Publication draft AAP and supporting evidence base reflect its own aims and objectives for the IAMP scheme.

In respect of the wider evidence base for the AAP, we are of the opinion that the publication draft AAP and supporting background papers accurately present the available evidence to inform the preparation of the AAP. However, should relevant additional information become available to us then we would make this available to the Councils to inform the Submission draft version of the AAP.

Soundness Tests

We believe that the AAP meets the "soundness tests" as defined in National Planning Policy Framework (NPPF) (paragraph 182) and can confirm in our view the following tests have been satisfied:

- **Positively prepared** - the AAP has been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.
- **Justified** - the AAP represents the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective** - the AAP is considered to be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with National Policy** - the AAP enables the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Specific comments

There are a number of specific points which we believe require further consideration in moving towards the Submission draft version of the AAP and supporting evidence base documents. These are set out below.

Site boundary

The emerging masterplan for DCO currently shows that there are works directly connected with the delivery of the IAMP that fall outside the AAP boundary as currently drawn on the Policies Map included at Appendix A. We enclose for your information the site boundary submitted to the Planning Inspectorate with the EIA Scoping Report and would highlight the following works falling outside of the current AAP boundary:

- **Proposed bridge over the A19:** – This bridge is referenced in Policy T1 and is required to connect the IAMP with the local road network to the east. As noted in section 5.1 the development of the IAMP site provides an opportunity for highway improvements to the road network to be implemented through the creation of new links and junctions. Detailed design work, including further modelling will be required to finalise the design of these measures, including the proposed bridge. We therefore request that Policy T1 and the supporting text are amended so that the area identified on the Policies Map as “A19 Improvements” is referred to as “A19 and Local Road Network Improvements” so as to include reference to the necessary improvements to the local road network to the east of the A19.
- **Utilities and drainage connections at the western end of the A1290 and Cherry Blossom Way:** The emerging utilities and infrastructure strategy for the IAMP anticipates the need for some new connections to existing infrastructure at the western end of the A1290 and linking into Cherry Blossom Way (see attached EIA Scoping site boundary). Whilst not necessarily necessitating a change to the AAP boundary, we request that Policy IN1 and the supporting text in Section 5.5 be amended to include reference to the likely requirement for supporting utilities and infrastructure to make connections outside of the AAP boundary.

Policy S1: Comprehensive Development and S3: Principal Uses

We consider that Policy S1 is essential and at the heart of ensuring a high quality and well-functioning advanced manufacturing cluster that is attractive to occupiers and investors, and able to respond with agility to market needs. In addition Policy S3 ensures that the take up of plots on the site accords with the national significance of this development and focuses on the growth of a strong supply chain to the automotive industry and related advanced manufacturing uses, which is beneficial to the North East and UK economy. Further, only comprehensive development can facilitate the timely delivery of site-wide infrastructure and mitigation – in accordance with the infrastructure delivery plan in the publication draft- that is needed to provide a platform for delivery of the IAMP. We therefore strongly support these policies.

Policy S2: Green Belt and Safeguarded Land

Whilst we support the principles set out in Policy S2 in relation to safeguarded land only being released for development through a review of the AAP, there is a need to enable road infrastructure and utilities to be constructed through the safeguarded land in this plan period to connect the development plots and provide the necessary improvements to the local road and infrastructure network. We therefore request that the policy is re-worded to ensure that such development is not contrary to AAP policy.

Policy S6: The Hub

The Hub represents an important component of the 'comprehensive development' of the site. We wish to clarify that that objective of the Hub is to provide supporting services to employees at and visitors to IAMP and the existing uses in proximity. It is not intended to be of a scale to complete with other District Centres.

I would be grateful if you would confirm receipt of this letter in due course.

Yours faithfully,

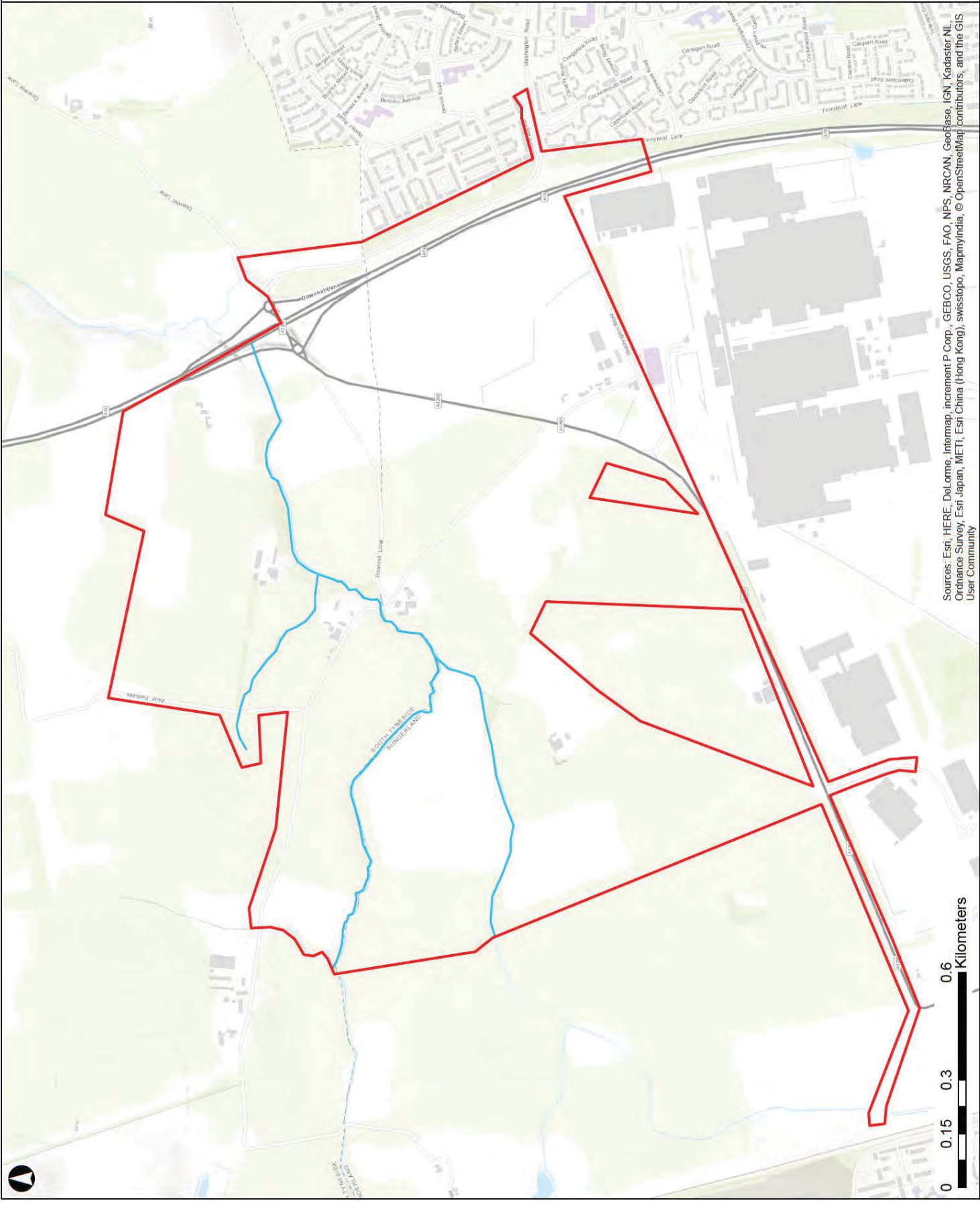


Alison Fellows



David Cramond

For and on behalf of IAMP LLP



Legend

- Proposed application boundary
- River Don

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Issue	Date	By	Chkd	Appd
I1	30-06-16	NIM	JB	FM

ARUP

Central Square
 Fifth Street
 Newcastle Upon Tyne
 NE1 3PL
 www.arup.com

Client
**Sunderland City Council and
 South Tyneside Council**

Job Title
**International Advanced
 Manufacturing Park**

Drawing Title
Indicative Site Boundary

Scale at A3
1:10,000

Job No
242745-00

Drawing Status
Issue

Drawing No
Appendix B

Issue
I1

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeBCo, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



Date: 10 August 2016

Sara Dunlop
South Tyneside Council
Head of Development Services
Town Hall
South Shields
NE33 2RL

Dear Mrs Dunlop

Proposed IAMP

I hereby object to the above proposed development plan on the following grounds:-

1. It is an inappropriate, unsustainable and unsuitable development in the environmentally sensitive "green belt" corridor preventing urban sprawl between the vast conurbations of Sunderland, South Tyneside and Gateshead.
2. There is no demand for this type of manufacturing space as there is currently more than enough spare capacity within the Tyne & Wear area, which on current trends will more than serve the needs of any potential manufacturing expansion well beyond 2027.
3. There are currently many better traditional manufacturing sites, with better infrastructure and transport links, based within Sunderland and South Tyneside, which are vacant and could be, or with a modicum of foresight should have been, utilised for this type of development e.g. Vaux site and traditional industrial areas along the banks of the rivers Tyne and Wear.
4. The proposed development will severely exacerbate current traffic congestion problems in the area and thus would have a detrimental impact on the vital Nissan "just in time" production process and therefore would also be detrimental to any potential manufacturers proposing to use the same process.
5. There is no evidence, in the form of letters of understanding or contracts that any investors propose to create or finance any jobs whatsoever (or indeed exactly what type of jobs they would be or whether the necessary skills actually exist in the area), which further calls into question the necessity for the proposed development.
6. The Tyne and Wear area currently has spare capacity, in automotive, advanced manufacturing, off-shore (in severe decline due to depleted oil reserves) and hi-tech industries. Therefore, the above objections (1. – 5.) in fact reduce the claim of "£300 million investment and creation of 5,200 jobs" to a political sound-bite which is repeatedly used as an excuse by politicians to try to justify a proposal to controversially

destroy the quality of life of desirable residential areas which attract the relatively wealthy, highly skilled workers necessary for investors to create high value businesses and sustainable economic growth.

7. The urban sprawl created by the proposed development would deter investors due to necessary highly skilled workers moving away to seek a better quality of life rather than living in the downward spiral of a benefits dependent urban wasteland very much like South Shields and Sunderland of today.
8. There are no benefits in the proposal and no justification whatsoever for destroying the "green belt", as no exceptional circumstances exist for doing so. In fact Sunderland and South Tyneside have for decades pursued exactly the same flawed and failed planning policy which has resulted in both areas becoming less and less desirable to live, work, socialise, invest and aspire to a better quality of life that green recreational, leisure, natural and agricultural land generates.
9. Therefore, it must be concluded this is **not** a prime location for jobs and industry.

Should you have any comments, queries or require further clarification in respect of the contents of this letter, please do not hesitate to contact me.

Yours sincerely

Mr Stephen Lounton



IAMP Area Action Plan Publication Draft Consultation

IAMP Area Action Plan Publication Draft - Consultation Response

The **International Advanced Manufacturing Park (IAMP)** is a joint venture between Sunderland and South Tyneside Councils that is currently being considered for allocation as part of their Local Plans.

Located next to Nissan UK's Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and advanced manufacturing businesses to innovate and thrive.

The AAP Publication Draft Documents can be found at the following links:

- www.southtyneside.gov.uk/iamp
- www.sunderland.gov.uk/iamp

This is the final opportunity to have your say ahead of the councils submitting plans to the Secretary of the State for public examination. This feedback form has been prepared in line with national guidelines to gather feedback on specific elements of the AAP, if you require further support, please contact us using the email addresses below.

The best way for you to feedback is by using this online form.

Alternatively, if you would like to print and complete a hard copy of this form, you can download it via the council websites

090816/MORRIS/014

above.

All feedback should be returned by midnight on 26 September 2016 via:

Post: Sara Dunlop, South Tyneside Council, Head of Development Services, Town Hall & Civic Offices, Westoe Road, South Shields, NE33 2RL

Email: iampp@southtyneside.gov.uk

Telephone: 0191 424 6257

Online: www.southtyneside.gov.uk/iampp

Post: Claire Harrison, Sunderland City Council, Project Office, Civic Centre, Burdon Rd, Sunderland, SR2 7DN

Email: iampp@sunderland.gov.uk

Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iampp

1. Personal Details

Title	Mr
First Name	Peter
Last Name	Morris
Job Title	
Address Line 1	
Address Line 2	
Post Town	
County	

Post Code	
Telephone Number	
Email Address	

2. Agent's Details (only required if you're representing a third party)

If this question does not apply to you, please move on to question 3.

Title	
First Name	
Last Name	
Job Title	
Organisation	
Address Line 1	
Address Line 2	
Post Town	
County	
Post Code	
Telephone Number	
Email Address	

3. Please give the number or name of the Paragraph or Policy your comment relates to.

For each policy that you would like to comment on, an individual form will need to be completed.

You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:

- www.southtyneside.gov.uk/iamp

- www.sunderland.gov.uk/iamp

Paragraph

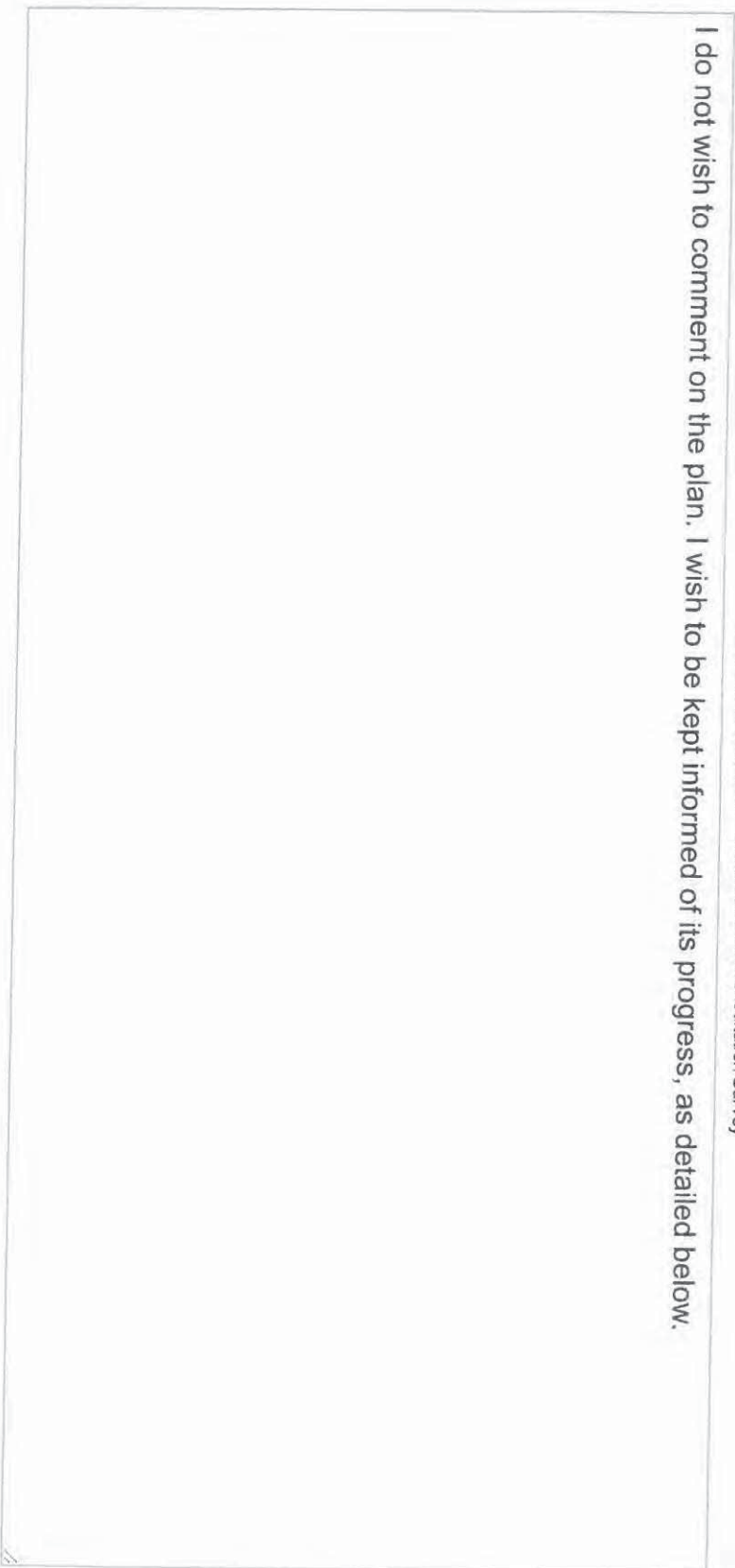
Policy

4. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- **Legal** – complies with the law
- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with

I do not wish to comment on the plan. I wish to be kept informed of its progress, as detailed below.



6. What would you like to happen?

- Delete policy or paragraph?**
- Amend policy or paragraph?**
- Add a new policy or paragraph?**

Please use this space to provide suggested revised wording of any of the policies or text.

the policies in the National Planning Policy Framework.

- Yes**
- No**

5. If no, please chose from the options below why do you not support the policy/paragraph?

- It won't work i.e. not effective**
- It is too negative**
- It isn't justified i.e. there is no evidence to justify the policy**
- It isn't consistent with national policy**
- It doesn't comply with the law**

Please use this space to add any further comments.

9. Do you wish to be notified of any of the following? Please mark all that apply.

- When the IAMP Area Action Plan Publication Draft has been submitted**
- When the Inspector's Report is published**
- When the IAMP Area Action Plan Publication Draft is adopted**

10. Please complete the below.

(If completing this form online, please type your name in place of a signature)

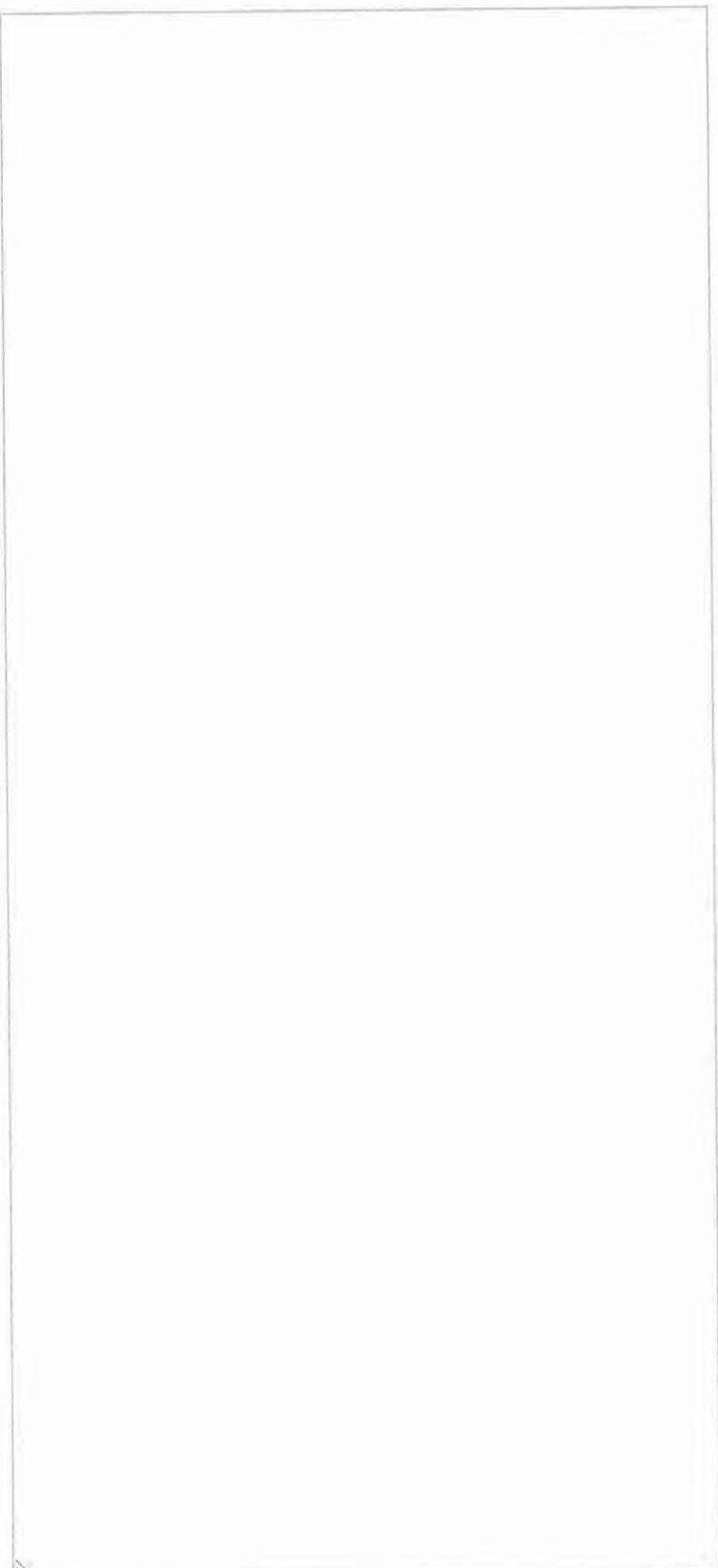
Signature

Date

09/08/2016

Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Submissions will be shared with external consultants, who are co-ordinating the AAP Publication Draft and consultation. Your name, organisation (if relevant) and comments may be made available to the public, in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be shared with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.



7. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

No

8. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

From: James Copeland [REDACTED]
Sent: 26 September 2016 17:48
To: IAMP SOUTH TYNESIDE; iamp@sunderland.gov.uk
Subject: IAMP Area Action Plan Publication Draft - Consultation Response - NFU

Dear Sunderland City Council and South Tyneside Council

**International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP) – NFU
Consultation response**

Thank you for the opportunity to comment upon the IAMP Action Plan. I write in the capacity as local representative of the National Farmers' Union in the North East with a particular interest in planning and economic development in rural areas.

I have highlighted a few areas for your consideration.

Page 5 – (2.3) – Site Availability – We would be keen to see matters relating to land acquisition and potentially CPO resolved with impacted parties at an earlier stage as possible during the negotiations. This will enable the agricultural businesses impacted time to make arrangements and plan for the future.

Page 9 – (3.2.2) – South Tyneside – It is noted that South Tyneside's Strategic Land Review has identified the site as an 'exceptional circumstances' for releasing land from the green belt. The NFU appreciates that our agricultural land, whether it forms part of green belt or the wider countryside, is valued through the town planning system for the essential role it performs for food production and for its landscape and environmental qualities, as well as its network of public footpaths. We seek further details on what impact future development may have upon the surrounding area, and if further 'exceptional circumstances' could be afforded.

Page 20 – 4.4.1 – Masterplan Objectives – We note the intention to steer development away from areas which are at risk of flooding and enhance the local environment. While the IAMP proposes to incorporate SuDS into the development, we would welcome a detailed assessment of all flood risks to both the development site and surrounding area.

Page 24 – Policy T2: Walking, Cycling and Horse Riding – The plan includes provisions to improve access to the open space for recreational purposes. Careful consideration should be given to where the routes are and specifically where they are in relation to agricultural land. In instances where access routes run alongside agricultural land, fences should be substantial and well maintained to prevent trespass and impacts on the agricultural business. We would expect that in the event of alterations to rights of way, landowners are thoroughly consulted at an early stage.

Page 27 – Policy IN2: Flood Risk and Drainage – We are encouraged to see that the Drainage Strategy will detail future ownership and maintenance responsibilities for the various parts of the drainage network. In an area which, as evidenced by the flood maps, is prone to surface water and fluvial flooding, it is essential that responsibilities are understood at an early stage to avoid future issues. We also note that within the Green Belt and Site Selection options Paper it states that no watercourses in South Tyneside have been modelled by the

Environment Agency. We would also welcome a detailed Flood Risk Assessment (FRA) and Water Framework Directive Assessment to inform the application which will hopefully enable effective water management. In the event that the flood assessment highlights the need to incorporate flood resilient infrastructure, as highlighted in the site selection paper, any increased build costs should not prevent the implementation of appropriate measures. Implementation, maintenance and replacement will need to be factored in with any associated costs clearly accounted for by the promoter.

Page 29 – Policy EN2: Ecology – While we acknowledge the further details will be provided in an Ecological Impact Assessment. We are yet to see details showing the impacts upon land need (and its availability) to offset any loss or if land in the local area is available or suitable to offset and archive net gains.

Page 31 – Policy EN4: Amenity – While we are pleased to see any IAMP impacts upon the surrounding area are considered. What assessment has been made of possible conflict (traffic, odour, noise, etc.) from surrounding agri-business and communities as the development extends into the Green Belt. We are concerned that the future of agri-business to develop or diversify may be limited by the proximity of the IAMP.

Page 33 – Policy Del2: Securing Mitigation – The plan states that ‘developer contributions may be appropriate to fund measures to mitigate the impact of the development on the environment’ and ‘similarly, it is possible that a proportion on environmental mitigation could be delivered directly by the promoter within the IAMP AAP area’. We would like to see these commitments clearly defined at an early stage to ensure environmental mitigation is effective in compensating for the loss of green belt land. Furthermore, mitigation should be futureproofed so that they do not disadvantage surround agri-business. Similarly, any developer contributions should also be defined early in the process.

Kind regards

James

James Copeland

Environment & Land Use Adviser

NFU North East

████████████████████

████

████████

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NFU, Registered in England No. 245E



amec
foster
wheeler

nationalgrid

Planning Policy
Sunderland City Council

[Redacted]

Robert Deanwood
Consultant Town Planner

[Redacted]

Sent by email to:

[Redacted]

18 August 2016

Dear Sir / Madam

**Sunderland City Council: International Advanced Manufacturing Park (IAMP) for the North East Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

National Grid infrastructure within Sunderland City Council

Electricity Transmission

National Grid has one high voltage overhead line (listed below) within Sunderland City Council's administrative area. This forms an essential part of the electricity transmission network in England and Wales.

Line Ref.	Description
ZZA Route	275kV two circuit route from West Boldon substation in South Tyneside to Hawthorn Pit substation in Durham.

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The following substation is also located within the administrative area of Sunderland City Council's administrative area:

Offerton substation – 275kV

[Redacted]

[Redacted]



National Grid may have a Deed of Grant Easement for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If further information is required in relation to an easement please contact Spencer Jefferies, Development Liaison Officer, [REDACTED]

Electricity Distribution

Northern Powergrid owns and operates the local electricity distribution network in Sunderland City Council, whilst Northern Gas Networks owns and operates the Gas Distribution network. Contact details can be found at www.energynetworks.org.uk.

SPECIFIC COMMENTS

Electricity Transmission

The following sites have been identified as being crossed by or within close proximity to OHL apparatus:

- International Advanced Manufacturing Park (IAMP)

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.
- T/SP/SSW22 – Specification for safe working in the vicinity of National Grid high pressure gas pipelines and associated installations – requirements for third parties.
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
- IGE/SR/18 – Safe working practices to ensure the integrity of gas pipelines and associated installations.
- HS(G)47 – Avoiding Danger from Underground Services.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

[Redacted]

Spencer Jefferies
Development Liaison Officer, National Grid

[Redacted]

Amec Foster Wheeler E&I UK

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

National Grid House

[Redacted]
[Redacted]
[Redacted]

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID TRANSMISSION ASSETS AFFECTED

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

[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

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 [REDACTED]

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

Q1: Personal Details

• TitleMr

• First NameDavid

• Last NameCharles

█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

Q2: Agent's Details (only required if you're representing a third party)If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to.For each policy that you would like to comment on, an individual form will need to be completed.You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp-www.sunderland.gov.uk/iamp
PolicyPolicy S6

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:• **Legal** – complies with the law• **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;• **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;• **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;• **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It isn't consistent with national policy

Please use this space to add any further comments.The policy does not pay regard to section WA3 of the UDP or Section 12 of the National Planning Policy Framework

Q6: What would you like to happen?

Add a new policy or paragraph?

Amend policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text.Policy P6 should be amended to be supportive of NELSAM The Hub area detailed in Policy P6 omits any reference to NELSAM, a museum which currently occupies 3.5 acres under an existing lease with Sunderland Council. NELSAM has also been granted planning approval to expand the area to a total of 5 acres. All of this lies within the boundaries of the area set aside for the Hub. The museum has been in existence for over 40 years and has run successfully, without Local Government funding. The museum has occupied its current location for over 30 years after relocating from the Airfield site to make way for the Nissan Development. The existing lease has a renewal clause which the museum satisfied many years ago. Negotiations have been on-going various parties within Sunderland Council for at least the last 8 years and certainly pre-date the IAMPS concept. As stated in section 4.2.1 the museum has been through a review to look at whether it is appropriate for the museum to remain at the current location. As

part of this review an Options appraisal report was commissioned, in conjunction with Sunderland Council, from Tricolor Associates to look at the options for the museum. This report has been discussed by interested parties in Sunderland Council. The outcome of this is the conclusion that the museum should remain at its current location. This has been stated in writing to the museum by Fiona Brown, Director of People Services. This decision is to be welcomed as it consistent with the statements contained within WA3 of the UDP and Section 12 of the National Planning Policy Framework which appear not have been addressed in Policy S6 The Trustees and Board members of NELSAM believe that Policy 6 should be amended to be inclusive of the museum and recognise the museum's regional significance by making a clear statement of support. One of the stated aims of Policy S6 is to provide Leisure activities which the museum currently does. A statement of support is also especially important as the City moves forward with its bid for City of Culture 2021, where the museum is working with the Museum Service and the Cabinet Member for Heritage to investigate how the museum could be expanded to co-locate other Council supported Heritage activities in one site. Before IAMPS the Cabinet Member for Heritage was supportive of growing the footprint to 14 acres which is still a small proportion of the overall IAMPS area

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

NELSAM are a stakeholder to Policy P6

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████

Date26th September 2016



Thank you for offering Nexus the opportunity to respond to the consultation on the draft International Advanced Manufacturing Plant (IAMP) Area Action Plan (AAP).

Nexus is currently working with Sunderland City Council and South Tyneside Council to determine an appropriate framework of public transport options that meets the needs of this evolving development area.

The provision of high quality public transport is essential to the development and sustainability of the site.

It is premature to specify at this stage the exact type or frequency of service; however, the intention is to provide a compelling alternative to the use of private car for commuting purposes, and to ensure maximum integration with the existing bus and Metro network.

Nexus supports the public transport measures outlined in the AAP, and looks forward to continuing to work with Sunderland City Council and South Tyneside Council and other relevant organisations as appropriate, to see these measures progressed as the IAMP is developed.



Ms. Claire Harrison
Sunderland City Council



210916/NISSAN/032

21 September 2016

Dear Sirs,

Ref : IAMP Area Action Plan

With reference to the International Advanced Manufacturing Park Area Action Plan (AAP), Publication Draft, August 2016 we make the following comments.

Nissan Motor Manufacturing (UK) Ltd. support the general proposals for the development of the International Advanced Manufacturing Park and the policies set out within the Publication Draft AAP.

To attract automotive component suppliers to this park will help Nissan to maintain a competitive edge within the highly competitive industry of automotive manufacturing.

Nissan therefore supports 'The IAMP Vision' and 'The IAMP Objectives' as stated in sections 2.6 and 2.7 of the Publication Draft.

We would however make the comments that if the land proposed for the IAMP is taken out of the Green Belt there are sufficient safeguards to protect the land for sole use of Automotive Supply Chain businesses and Tier 1 suppliers to Nissan along with the provision for engineering, innovation and skills development.

We consider this land should not be used for major office developments, other retail storage units or retail warehouses.

The proposed IAMP Development should follow the Comprehensive Development set out in Policy S1 and all planned activities on IAMP should be carried out in accordance with this policy to ensure no adverse impact on Nissan business. Development in an unplanned, uncoordinated manner is not appropriate for a site of such national economic significance.

Other items we consider should be taken into account in the consultation process is the provision of sufficient car parking within the planning provisions of IAMP and also consideration for the provision of a lorry park. Both issues have the potential to increase congestion and affect movement and design quality of the IAMP and we are aware that Sunderland City Council is reviewing lorry parking provision generally in the Washington area.



A key concern for Nissan at this stage of the Consultation is the fact that Highways England has not yet declared its proposed development plans for the improvement of the A19.

Traffic congestion has always been a major concern for Nissan and the need for efficient access for both employees and logistics is an essential requirement for the success of manufacturing at Nissan.

We have met with Highways England on several occasions to discuss potential improvement options to the A19 and have made comments that the proposed road layout Option 25 gives the best solution to avoid congestion and best means of entry and egress from the Nissan site for both employees and logistics.

We strongly recommend that Option 25 is the proposed option adopted for the A19 and the Downhill Lane junction to support IAMP.

Regarding the timing of IAMP commencement, we request that all decision making processes are kept to the shortest possible times as we would not want to miss the opportunity of a key supplier relocation to meet Nissan manufacturing schedules.

Should a key supplier wish to relocate before the current IAMP schedule we would request that special measures could be put in place to accommodate such a relocation onto the proposed IAMP site.

Finally we are an active member of a working group with Sunderland City Council on all items relating to IAMP and we would hope all comments made at meetings would be taken into consideration.

Yours sincerely,



Kevin Fitzpatrick
Vice President – Manufacturing UK Operations



sent by e-mail
[Redacted]

North East Local Nature Partnership
[Redacted]
[Redacted]
[Redacted]

7th October 2016

Dear Sirs

International Advanced Manufacturing Park (IAMP) - Response to AAP Consultation

I write in reference to the above and to offer the comments of the North East Local Nature Partnership (NELNP) on the IAMP proposal at the AAP consultation stage. The comments provided should be viewed and read in the context of the Duty to Cooperate.

The NELNP welcomes the opportunity to comment on the combined efforts of Sunderland and South Tyneside Councils to bring forward the International Advanced Manufacturing Park. There is a significant economic opportunity for the North East in this proposal and although it requires deletion of land from the Green Belt, with the right environmental enhancement, mitigation and a "net gain" approach to habitat and water quality, it is considered that biodiversity gains can be made. Notwithstanding there are several ecologically sensitive features spread across this landscape, thoughtful and extensive use of high quality blue and green infrastructure to minimise the impact of development can ensure that the scheme becomes an exemplar in terms of enhancing the natural environment whilst facilitating delivery of significant inward economic investment.

IAMP is located on community fringes and the scale of the site should enable the development to become a local asset to all by improving connections with the landscape in the site design and delivery. To support the place making aspect of IAMP, it is important to understand the health challenges and opportunities of the workforce and local communities and to integrate these needs with aspects of park design to contribute healthier lifestyle choices whilst still contributing positively to biodiversity. Managed access onto and through the site will make an important employment site visible to local communities and for them to better understand the local employment opportunities available.

The NELNP welcomes the IAMP team's willingness to engage in an Environmental Design Review (EDR) as part of the Development Consent Order process and looks forward to further discussion on the structure, format and objectives of the EDR in due course.

Yours sincerely,

[Redacted Signature]

Chairman

North East Local Nature Partnership
[Redacted]
[Redacted]
[Redacted]

www.nelnp.co.uk
[Redacted]

21 September 2016

Sunderland City Council

Dear Sirs

Consultation Response to the International Advanced Manufacturing Park for the North East Area Action Plan

Thank you for the opportunity to provide a consultation response to the International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP) consultation. Northumbrian Water fully supports the joint production of the draft AAP by South Tyneside Council and Sunderland City Council and consider that the document will guide sustainable development on the IAMP site and promote the region's economic growth. We have reviewed the draft AAP in detail and we set out comments below on topics which we feel are of relevance or have an impact on us, as the statutory water and sewerage undertaker.

We strongly support the vision identified for IAMP, which includes reference to the site being a 'planned and sustainable employment location' and consider that water management should form a key element that contributes to the wider sustainability of the site. We further welcome subsequent reference to maximising benefits from natural assets such as the River Don and the associated corridor of green infrastructure. An integrated approach to surface water management can produce multiple benefits spanning flood risk, water quality, ecological benefit and amenity value.

In our previous response, we referenced the requirement for additional consultation as further drainage details emerge, including the intended phasing and specific location of development along with the nature and volume of flows likely to be produced by the IAMP. We consider that whilst the AAP Policies Map does give some additional detail on the location of development within the wider site, further consultation once specific information is available will allow us to provide a more detailed response in relation to sewerage network and sewage treatment capacity relevant to inform drainage design.

Moving on to the objectives identified for IAMP, we are pleased to note reference to flood alleviation and water quality in relation to the River Don in Objective 13, which has the scope to positively impact upon the wider River Don catchment in line with the vision of the Don Integrated Catchment Project, which is led by the North East Local Nature Partnership and includes South Tyneside Council and Sunderland City Council as partnership members.

Northumbrian Water have contributed to and signed up to the Don vision, and initiated the River Don Partnership which will develop an action plan to deliver this vision, so we are keen to see how we can support new development to maximise opportunities for environmental benefit to improve the catchment environment for all parties.

Furthermore, we support Objective 9 which states that design and development will be encouraged based on sound sustainability principles. We do however suggest that there is scope to include specific reference to sustainable water management, such as the requirement for sustainable drainage systems on new developments across the site. The inclusion of such a requirement within the objectives for IAMP would reinforce the aspiration for a flagship development that is world-class and sustainable across all disciplines.

We support that the emerging Local Plan references the importance of careful masterplanning of the IAMP site and seeks to avoid piecemeal development. Masterplanning is particularly important in the context of drainage and flood risk to ensure that an appropriate, sustainable drainage strategy is identified at the outset that will accommodate all phases of future development.

Within Chapter 4, we welcome that the masterplan objectives include a surface level strategy for drainage which will reflect the natural environment and offer a broad range of benefits, including water quality improvements and sustainable flood risk management, alongside health, wellbeing and amenity value. We strongly support the reflection of this objective within Policy D1, where it is stated that drainage infrastructure is to be accommodated within the above-ground street network, with the utilisation of sustainable drainage systems, and also within Policy D2, which seeks the provision of green and blue infrastructure at street level. We further support the protection of the River Don corridor within the masterplan objectives, which can provide an important green infrastructure function within the site whilst also minimising the impact of IAMP in the wider catchment.

Moving on to Section 5.6, *Flood Risk and Drainage*, we greatly support Policy IN2 and consider that the requirements outlined will ensure a sustainable approach to drainage on the site, particularly with regard to the use of sustainable drainage systems for surface water management and also to the need for developers to confirm that appropriate capacity exists within the foul sewerage network to accommodate flows from the site. We further welcome the supporting text to Policy IN2, which provides useful detail to guide the development of IAMP in line with the identified principles.

It is pleasing to note that references to green infrastructure and sustainable drainage techniques continue throughout the AAP, such as the need to consider the incorporation of green and brown roofs and green walls into the design of the IAMP development within Policy EN1. These references demonstrate the commitment of the Councils to ensure the IAMP site is brought forward in a sustainable manner that maximises the many opportunities offered by such a strategic scheme.

We trust that this response is useful to you in moving forward with the development of the International Advanced Manufacturing Park and welcome future opportunities for consultation and involvement. We would welcome invitation to any future masterplanning and design sessions when further detail regarding the site is likely to be discussed. Should you wish to discuss our response, please do not hesitate to contact Laura Kennedy, New Development – Planning Team at [REDACTED]

Yours faithfully

[REDACTED]

Richard Warneford
Waste Water Director

Q1: Personal Details

TitleMrs.

- **First Name**Mary
- **Last Name**Peel



Q2: Agent's Details (only required if you're representing a third party)If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to.For each policy that you would like to comment on, an individual form will need to be completed.You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp-www.sunderland.gov.uk/iamp
ParagraphAppendix A

Policy1.b

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- Legal – complies with the law
- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It isn't consistent with national policy

Please use this space to add any further comments.We need inward investment , but consuming ever more green belt land is not the answer as there is a surplus of under developed brownfield sites . This is a far more realistic and sustainable use of resources. Our area certainly needs jobs and sustainable growth , but the planners ought to be linking this to sites proximate to rail links as excess road traffic is a major problem in the region. Further , rail transport will mitigate the impact on the environment and human health. The ruination of green belt land through development is permanent and never to be replaced.

Q6: What would you like to happen?

Amend policy or paragraph?

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

In order that the weight of public opinion is fully recognised .

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

When the Inspector's Report is published

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████

Date26/09/2016

To IAMP Trustees,

I would say to you that
the plot is bigger than
Nissan's existant plant.

My question is so why?

And is the Wewerley

Colliery site not good.

ie. it has rail links (disused

to Usworth nr. ASDA so

the goods yard there would

be better! N ROBB

100816/ROBINSON/037

From: david robinson [REDACTED]
Sent: 10 August 2016 19:39
To: IAMP
Subject: Advanced Manufacturing Park

Dear Sir/Madam,

In your new consultation leaflet dated 08/08/2016, there is no mention or site plan indicating what is happening to the existing Aircraft Museum.

Could you please tell me what is proposed for the future plans to preserve the museum.

Regards

David Robinson,
[REDACTED]

Q1: Personal Details

- Title Mr
- First Name Tony
- Last Name Jarrett

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp www.sunderland.gov.uk/iamp
Paragraph all

Policy all

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- Legal – complies with the law
- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Respondent skipped this question

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments. We are an aviation group called 'Save the Trident' who dismantled and moved to the North east land sea and air museum the last and only full example Hawker Siddeley Trident 1c jet airliner G-ARPO . Over the last five years we have restored the aircraft fuselage inside and outside of which it is now opened to the public. Inside we have audio , visual and displays while outside it is painted in the airline (NORTHEAST)that flew Tridents out of the Northeast airports. We have prepared the wings and tail in readiness to be reattached Our Trident aircraft is 114ft long with a 90 ft wingspan when together and is not an aircraft we can just pick up and place on a giant trailer and move on any road. The damage caused keep lifting it again would be big and being an iconic historic aircraft that is the last of its type would be destroying a piece of our British Heritage. We as a group are against the plans of the present parks boundaries as it shows that that the museum would not exist as the plans state at the moment although we would embrace the park if the museum was allowed to stay and grow . We believe that the IAMP would benefit hugely by including the museum in its plans and upgrading the facilities , buildings By keeping the museum their with upgraded facilities and buildings there would be a greater potential reached from the IAMP Firstly the companies that move into the manufacturing park could bring their up to date technology's to the museum which would run alongside exhibits of yesteryear creating an experience for the public like no other museum. The nearest like it would be Enginuity at Ironbridge/ By doing this it would also be a way the companies on the park could bring potential clients to see their technology in operation of which in turn would bring more prosperity and jobs to the area as contracts are won. secondly Education , the museum plays a

big part in learning with schools and outside school groups like scouts , cubs and as well as disabled groups. It also has our Trident aircraft to go on which is probably the only one in the northeast you can go on of which many children and adults have never done . Thirdly by keeping the museum with a little extra growing land available for expanding the councils of Sunderland and South Tyneside could potentially save huge amounts of tax payers money each year which could be diverted to other services if they looked at condensing other collections that would be appropriate to the museum site thus not requiring to pay out costs on other sites but still providing these collections and services to the Northeast and the public that they serve fourthly . Has the councils ever thought of running a couple of the museums trams out of the museum on a track that could run from one side of the park over to the other connecting up to the bus route that brings the public and business workers down to the hub which would keep it a lot environmentally greener . A nostalgic bus could also run to Sunderland , Durham Newcastle too, I have a great vision for the museum that coexists hand in hand with the park that i believe would bring more prosperity and jobs, after all the museum would create jobs in itself. All i ask is if you could keep the museum and square it off up to the bowling green and across and down to the vulcan as the Trident needs a bit more room to be able to put together and use a little more of the spare land. . This i believe is a win for the IAMP park , a win for education , a win for the council , a win for the museum and a win for the people of the Northeast Yours Sincerely Tony Jarrett Project leader of Save the Trident

Q6: What would you like to happen?

Respondent skipped this question

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

I wish for us to have a voice as the Trident aircraft is a very important part of our British heritage

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted

When the Inspector's Report is published

When the IAMP Area Action Plan Publication Draft is adopted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████

Date 22/09/2016

From: David Simpson [REDACTED]
Sent: 21 September 2016 21:11
To: [REDACTED]
[REDACTED] Stephanie Simpson; [REDACTED]
IAMP SOUTH TYNESIDE
Cc: [REDACTED]
Subject: Fwd: IMAP Sunderland council proposal

Hi

Please see below my concerns highlighted to Sunderland council and ardent management many of which have not even been acknowledged. I would like some answers to my questions as we have not had any to date.

Regards
David Simpson

Hi Vince

Reference the meeting at Boldon last night which my wife and I attended, you said to let you know any additional concerns we may have regarding the IMAP proposal.

As I made you aware last night we have recently finished our "forever" house with planning permission from Sunderland council and bought the house next door also for family to enjoy.

[REDACTED] IMAP proposal would have a missive affect on our enjoyment of the area, views and standard of living as well as devaluing our houses.

I have already spoke to local agents who say both properties would be less desirable to live in or let and would decrease in value because of the IMAP development.

The development of the latest Vantec site is further away than some of the IMAP proposals but has caused us concern already. Because of the openness of the fields in front of us and the lack of natural barriers there has been constant banging heard from early in the morning and the bright lights shining straight at us at night (picture below of Vantec at night).

These massive factory units are having a negative affect on us and I can only see it getting worse if the IMAP proposal is granted planning permission. The proposal also we feel is contrary to planning law where you should only develop greenbelt land under exceptional circumstances and would join up local villages where the greenbelt should remain established.

Developing properties for 25 years these greenbelt laws are what I have always been told from Sunderland council when asking about developing greenbelt sites. There are many other sites other than greenbelt land this proposal could be developed on, especially now that all land nearby from Nissan to the bottom of Sulgrave has been developed on by Johnson control, Unipres, fergisons transport, vantec, Nissan car parks and now the ongoing Vantec aforementioned site(close to the bird wildlife sanctuary), which again we were not informed of.

We have passed many un - utilised Business Parks all the way along the A19 Corridor – which have already been developed and are lying empty, surely this would be a better use than taking yet more Greenbelt – which (as you said at the meeting, the lifespan of the automotive industry in this area may only be another 30 years – and that this makes up 80% of the IMAP Business Park, with the further 20% being feeder companies for the automotive industry) In 30 years will be looking at even more disused factory wasteland!

Local roads could not take the increase load of 5000 extra workers where follingsby lane already has become a rat run and is dangerous at present with a narrow lane and people exceeding the 40mph speed limit, my wife has been forced into the side on several occasions by lorries, speeding cars, ect coming at her in the middle of the road since Follingsby park was developed again on Greenbelt land.

The local community I have spoken to feel this is a step too far taking up the final pieces of greenbelt of Washington unnecessarily and want a stop to it before nothing of the greenbelt is left for future generations to enjoy.

Conclusion

Vantec

Do you know of any plans to landscape in front of Vantec to block out these intrusive lights or can they be pointed down rather than at us! Is the noise now finished with because the factory has been completed?

IMAP

Should the proposal be granted will there be any compensation for us for the Negative affect it will have on our property value and impact on our lives? We will hopefully be informed of the process from now on and options/infrastructure arrangements that are proposed.

I look forward to a reply from you regarding these and previously mentioned issues below.

Regards

David Simpson



Sent from my iPhone

From: David Simpson [REDACTED]
Date: 7 April 2016 at 12:32:19 BST
To: Vince Taylor [REDACTED]
Subject: Re: IMAP Sunderland council proposal

Hi Vince

We still have had no reply to the additional questions we supplied on line, will we be getting a response?

Regards
David & Stephanie Simpson

On 22 Feb 2016, at 13:10, David Simpson [REDACTED] wrote:

Hi Vince

We still have had no reply to the additional questions we supplied on line, will we be getting a response?

Regards
David & Stephanie Simpson

On 28 Jan 2016, at 17:37, Vince Taylor [REDACTED] wrote:

Dear David,

It was good to meet you on Monday at the Quadrus Centre for our consultations event. Thank you for your email. I am sorry but having scoured my email inbox I don't seem to have received your email of 15th January. However, here is my response to the points you have made.

As I outlined verbally on Monday, we have written on more than one occasion to all of the addresses within the wide area bounded by the A184 to the north, A19 to the east, Nissan plant/A1290 to the south and Washington/Leamside line to the west. In the current consultation, the following have been posted to each address:

1. Introductory letter sent directly in March 2014.
2. Letter sent on 10th November 2015 inviting the occupier him to attend the consultation and briefing open day held on the 16th December 2016.
3. A further letter sent on the 8th December, inviting the occupier to attend an evening consultation event on 25th January (for those who did not attend the event on the 16th December)

So we were as puzzled as you were as to why you had not yet received any information. We then discovered that, records from the land registry information give Mr David Simpson as residing at [REDACTED]

[REDACTED] which is where all direct correspondence has been sent to.

However, you explained that your true address is [REDACTED]

[REDACTED] If the land register has not been kept up to date then that would explain why they were not received at your current address, but instead will have gone to [REDACTED]. We will send you a copy of the correspondence sent so far in order that you have the complete set.

I attach a map of the wider area. Properties within the A184/ A19/Nissan plant/Leamside Line "box" have been sent letters. This outside of that "box" but within the red line shown on the map were each sent a leaflet relating to the Green Belt Options consultation.

It is the view of both Sunderland and South Tyneside Councils that within a six week consultation period, enough time and opportunity has been allowed for residents, businesses, landowners and property owners to comment on the proposals being put forward in the current consultation. I realise that in your case, you only heard about the proposals mid-way through the consultation period, but I hope that your meeting with Gary on 11 January and then with me on Monday has been helpful in your being able to contribute to the consultation.

I see that you have sent me an email with your views, which is very helpful. Could I encourage you to submit these via the Council web site at <http://www.sunderland.gov.uk/index.aspx?articleid=11379> (or search the Council site for IAMP Have Your Say). I will answer your questions in that email in due course.

Many thanks again for coming to talk to us and sharing your views.

Yours Sincerely,

Vince Taylor
Head of Strategy and Performance
Sunderland City Council



From: Simpson, Stephanie [REDACTED]
Sent: 22 September 2016 11:14
To: David Simpson; [REDACTED]
[REDACTED] IAMP SOUTH TYNESIDE
Cc: [REDACTED]
Subject: RE: IMAP Sunderland council proposal

Dear All

I concur with my husband's opinion on this development on green belt land. BUT I would like to point out AGAIN, that I think that this consultation period has been handled in a non inclusive and appalling fashion. Websites that we have been directed to give formal complaints, were created in "PDF" formats and therefore could not accept the complaints!

The wording on all documentation from the start were in "jargon" and therefore not inclusive to the general public. Maps were confusing. Plus the tactic from the beginning of this "consult" was one of a forgone conclusion as the questions put the general public did not give an option of NO, it only gave the option of choosing one of the 3 scenarios – which is a typical selling tactic.

Whomever has been employed to put all of the wording together – especially for the websites have not made any of this easy for the general public to respond. Having attend 2 of the "open Forum" these were in fact just divide and conquer drop in consults with no extra or valuable insight or information given. Just more of the same "wordy" and confusing scenarios as the leaflets & letters.

On this note I do not think this consultation has been carried out in a fair or unbiased way – as every question has lead the public to believe we have to make a choice of the 3 given options.

When I have flagged in the past that your website (which is how the general public have been urged to make their opinions through) does not work because of the formats you have created the forms in – I got NO response!

From the start of this "Consultation" I believe the general public have NOT been given the tools or information to give an informed opinion. Your Forms have NOT been adequate or easy to use (in some cases could NOT be accessed at all because of the PDF) When we asked whom had received letters – no-one could give us a definite answer – [REDACTED] area and did not receive the 1st 2 letters. Family members also live in [REDACTED] to the proposed site and again NONE of them received any letters.

I trust you have logged our opinions and that putting all of the North East's eggs in the automotive industry basket is a very risky long term strategy which will affect our green belt forever.

As stated there are many brown field sites "unused" on both sides of the A19 which could simply be redeveloped.

I trust we will get an acknowledgement this time. The reason I have resorted to email is once again your on-line forum is just too difficult to navigate, and I am proficient IT user.

Kind regards Stephanie Simpson

Stephanie Simpson

Regional Charity Manager – North East



Cash for Kids registered charity 1122062 (England & NI) and SC041421 (East Scotland)

Q1: Personal Details

- TitleMr
- First NamePaul
- Last NameStorey

█ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]
 █ [REDACTED]

Q2: Agent's Details (only required if you're representing a third party) If this question does not apply to you, please move on to question 3.

Respondent skipped this question

Q3: Please give the number or name of the Paragraph or Policy your comment relates to. For each policy that you would like to comment on, an individual form will need to be completed. You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:- www.southtyneside.gov.uk/iamp - www.sunderland.gov.uk/iamp

ParagraphA

PolicyS1

Q4: Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant) To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- Legal – complies with the law
- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

No

Q5: If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective

It isn't justified i.e. there is no evidence to justify the policy

Please use this space to add any further comments.

I have attended a consultation meeting about the IAMP at Boldon Village Hall and after talking to the planning representative there I disagree entirely with the IAMP proposal. There are a lot of existing manufacturing/ industrial/ business parks in Sunderland and South Tyneside and all have empty units or development sites available. All within easy commutable distance from Nissan. I appreciate this falls within government policy for the Northern Powerhouse etc but this was all decided prior to the Brexit vote and since then industrial output has declined. Nissan is currently deciding whether to increase production in Sunderland or actually pull out so there is little point in destroying greenbelt land until this decision is made. The rep also said there had been a lot of consultation with Nissan's supply chain and a lot of positive feedback with companies saying they would relocate to the North East to be closer to Nissan. However, when I asked for examples he could not give me any. I then asked if there had been any companies signing up to definitely come to the IAMP he said no! This appears like wishful thinking on behalf of the government and involved councils and is a "shot in the dark!" on a "if you build it they

will come" basis. This is a large amount of Greenbelt land we are talking about bulldozing and without any assurances from companies intending to come to it should we not do more consultations or wait until the full extent of Nissan's future plans become known? At the very least do we not need to look at the scale of the project and start with a smaller chunk of land and seeing what the uptake is before just going smashing into the greenbelt?

Q6: What would you like to happen?

Delete policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text

Have a longer consultation period, let Nissan make some decisions on it's future, scale down the amount of land intended to be released from the greenbelt, at least get some companies to sign up before bulldozing begins.

Q7: For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes

Q8: If so, why do you feel this is necessary?(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

I believe there will be a lot of people who share my view and without being heard this white elephant will go ahead unchallenged.

Q9: Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft is adopted

When the Inspector's Report is published

When the IAMP Area Action Plan Publication Draft has been submitted

Q10: Please complete the below. (If completing this form online, please type your name in place of a signature)

████████████████████
Date24/08/16

051016/TEFP/039



Formal Representation

Response to IAMP Area Action Plan Publication Draft
Consultation (August 2016)

Prepared on behalf of Town End Farm Partnership

September 2016



Unlock. Deliver.

Contents



- 1.0 Introduction
- 2.0 Effectiveness of the AAP
- 3.0 The IAMP Objectives
- 4.0 Our response – Objections and proposed amendments



Unlock. Deliver.

1.0 Introduction

1.1 This representation is an addendum to the completed pro forma 'IAMP Area Action Plan Publication Draft – Consultation Response Form' (attached at Appendix 1) and forms part of the formal response. The submission is made on behalf of Town End Farm Partnership ("TEFP") and has been produced by Hedley Planning Services Limited (the "Agent").

1.2 This response is made having regard to the document titled International Advanced Manufacturing Park ("IAMP") Area Action Plan ("AAP") Publication Draft (August 2016) (the "AAP Publication Document") made available via the Sunderland City Council and South Tyneside Council websites. The evidence base which informs the AAP Publication Document has also been carefully reviewed.

1.3 TEFP is uniquely qualified to comment on the IAMP APP, particularly given the extent of the social, environmental and economic assessments that it has undertaken for the purposes of its own planning application, and its representation carries material weight as the freehold owner of a significant site within the indicative IAMP boundary. This document supplements the pro forma submission and is additional evidence and comment which we respectfully request that the joint authorities consider formally prior to the AAP being submitted to the Planning Inspectorate.

1.4 Overall the TEFP is, in principle, supportive of the IAMP proposals and has historically supported its proposed delivery through the Core Strategy and latterly the Development Consent Order ("DCO") procedure. However, as the freehold owner of a development site forming part of the AAP (Phase 1), TEFP seeks to ensure that the emerging document:

- (i) is sound;
- (ii) is positively prepared;
- (iii) is objectively assessed;
- (iv) uses a correct and proportionate evidence base;
- (v) is aspirational;
- (vi) is deliverable;
- (vii) avoids significant adverse impacts;
- (viii) is justified – e.g. considers positively alternative options which reduce or eliminate impacts;
- (ix) considers compensatory measures where impacts are unavoidable; and
- (x) is consistent with national planning policy.

1.5 The National Planning Policy Framework ("NPPF") and National Planning Practice Guidance ("NPPG") seek to facilitate aspirational but realistic development proposals (NPPF Paragraph 154).

1.6 With regards to business development local planning authorities ("LPA") are charged with having a clear understanding of business needs and to work closely with the business community to understand their needs and address barriers to investment (NPPF Paragraph 160).

1.7 In providing this formal representation to the AAP for IAMP, our response has been mindful of the evidence base, including the qualitative and quantitative need, infrastructure capacity, the environment, and the need to ensure viability and deliverability.

1.8 TEFP have instructed WSP Highway Engineers to review the likely impacts and delivery of the AAP proposals from a highway perspective and Shandwick Surveyors to review viability of the proposed location of the “hub” element of the draft AAP. For completeness ease of reference the reports are appended to this report.

2.0 Effectiveness of the AAP

2.1 Every Local Plan must be informed and accompanied by a Sustainability Appraisal. A separate document to supplement the AAP has been provided which allows the potential environmental, economic and social impacts of the proposals to be considered. National guidance provides that the Sustainability Appraisal “plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives” (NPPG Paragraph: 017 Reference ID: 12-017-20140306). The Guidance also directs that where there is conflict with this sustainability objective then the plan is considered not to be sound.

2.2 The AAP also requires a Habitats Regulation Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended) if the AAP is considered likely to have significant effects on European habitats or species, located in the LPA’s area or in its vicinity. A Habitats Regulation Assessment does not appear to have been carried out. The Sustainability Appraisal Non-Technical Summary states that this was not necessary as the proposed IAMP AAP is not considered likely to have any direct or indirect impact on European designated sites. The first stage of a HRA process has been undertaken to “inform” if there are likely impacts.

2.3 The AAP document necessitates consideration of both in regard to the Policies Map (Appendix A) and the text that forms the chapters 1 to 7 of the main document. The evidence base behind Section 2: 'The International Advanced Manufacturing Park: Strategic Context, Vision and Objectives' is the starting point to inform the AAP. We have reviewed both documents as part of our formal objection.

3.0 The IAMP objectives

3.1 The IAMP AAP seeks to provide a planning framework for the delivery of an employment development pursuant to a DCO (under the Planning Act 2008) following the designation of IAMP as a Nationally Significant Infrastructure Project (“NSIP”) in September 2015. The Sunderland City Council draft Core Strategy and Development Management Policies 2013 (the “emerging Core Strategy”) relies upon an emerging strategic allocation on land north of Nissan (20 hectares within the freehold of TEFP) and does not include the wider IAMP AAP.

3.2 The draft AAP seeks to deliver the requirements of the emerging Core Strategy policy preferring Class B1 (B1(b) and B1(c)), B2 and B8 uses with the requirement that the site will be developed to accommodate major employers. Piecemeal development is not considered appropriate (emerging Core Strategy policy CS3.2).

4.0 Our response – Objections and proposed amendments

Policy S1: Comprehensive Development of IAMP – OBJECTION

4.1 Proposed Policy S1.B states that only the delivery of a single comprehensive scheme which meets the objectives of the IAMP AAP will be supported. What this means, following a review of the supporting text, is that the site should come forward as one proposal rather than “piecemeal” as envisaged by the draft Core Strategy. So the policy proposition is that anything other than comprehensive delivery (this is not explained) would be considered prejudicial to the delivery of the IAMP AAP objectives and overall delivery.

4.2 What Policy S1 and the objectives of the AAP fail to consider at all is the immediacy of delivery. The AAP covers demand and supply (evidenced in various documents including the Green Belt justification document and the PwC report) however it does not seek to address the clear immediate demand for employment floor space which cannot be addressed by the DCO process. Only an immediate application (such as TEPF's current planning application for industrial accommodation to meet the existing and urgent needs of Nissan Tier 1 suppliers) is capable of comprehensively addressing the delivery of a floor space for immediate requirements in the market before the end of 2017.

Our Response Proposed Amendments

4.3 We object to this policy as there is no evidence base to suggest that the joint authorities can control both the delivery of IAMP and the end users. There is a need for flexibility in the masterplan, given that delivery is over a 15 year period and a start date for the IAMP scheme is some years away. Further, there is no evidence base to suggest that a 100 hectare site can be delivered in accordance with the masterplan and phasing regime. By comparison, there is clear evidence of an immediate economic need for employment floor space which is unlikely to be satisfied if Policy S1 remains as currently drafted.

4.4 We therefore request that this draft emerging policy is clarified and amended to ensure that individual planning applications, such as the current planning application by TEPF, can be accommodated as part of a comprehensive development of the site. That is to say that the proposals which are AAP compliant should be classified as comprehensive development for the purposes of Policy S1.

4.5 The term "delivery of a single comprehensive scheme" requires clarification. This is unachievable and not supported by any evidence. It is assumed that this wording seeks to underpin the importance of the masterplan and the delivery proposals of De1 and 2 (Objections below). From a scheme delivery perspective there is no guidance to support the delivery of substantial applications made by anyone other than the scheme promoter (i.e. Sunderland City Council and South Tyneside Council).

Policy S5: Ancillary Uses – OBEJCTION

4.6 Drafted Policy S5 is confusing, and it does not provide the necessary certainty to deliver ancillary uses within the scheme. The small scale retail element is not sufficient to allow meaningful provision to entice national retailers to taking up floor space. NPPF paragraph 26 allows for up to 2,500 sqm (where there is no locally set threshold) of out of centre retail; anything above this requirement is considered as potentially having an impact on existing centres and therefore requires an impact assessment.

4.7 The Report by Shandwick Properties, appended to this Representation, provides market commentary on the proposals which are contained within the live planning application by TEPF, and the Report includes an assessment of why such uses would not be successful outside of the proposed Hub element of the live planning application.

4.8 Policy S5 of the AAP states that the delivery of the Hub should match with the take up of employment land. It is therefore reasonable to conclude that the Hub will take some time to develop.

Our Response:

4.9 NTFP already have end users identified and those end users are committed to the provision of the Hub on-site and in a central location. This also assists in the attractiveness of the site for investment.

4.10 We request that the ancillary policy be amended to provide certainty to retailers as to the location of a hub, given the likely demand for their goods and an inclusion for a car showroom given that local manufacturers will want to showcase their product.

Policy S6: The Hub – OBJECTION

4.11 Paragraph 2.7 of the IAMP Objectives sets out the 13 key indicators against which success will be measured.

4.12 Point 11 is to: Create a central hub to provide identity and encourage public transport. The proposed location of the Hub in the IAMP scheme, defined by Policy S6 and as illustrated in Appendix A, is clearly in conflict with the key indicator for a number of reasons detailed below.

4.13 The Hub is not central to the IAMP site, and due to the size of the IAMP the Hub will be in excess of 1.3 km from the employment development that is identified in Policy S3. At Appendix 3 of this report is a report prepared by WSP highway consultants. Previous iterations of the plan illustrated the Hub to be more centrally located, however this location was considered unsuitable for reasons that included ecology and flood risk. The earlier iteration was clearly led by the obvious benefits of the Hub having a logical location centrally within the site, allowing it to be accessible and also equidistant for the wider IAMP scheme. It is acknowledged that in instances where a walking distance typically exceeds 750m, people may take the car, adding to the use of private vehicles within and around the site. This reflected in NPPF paras 29 – 30.

4.14 The legibility and visual impact of the Hub is also essential to its function. The August 2016 Publication Draft illustrates it being on the southern boundary with Nissan, and this would remove it from the key gateway (A19) and visually it would be detached and not an obvious Hub as the centre of activity for the wider IAMP site.

4.15 Rather, the location of the Hub as set out within the AAP would become a focal point; this is proposed to be at the main entrance to Nissan. This would undoubtedly have an adverse impact on transport and traffic. The resultant increase in traffic, which is encouraged through the Objectives of the IAMP, would have an impact on and impede the day to day activities and access and egress of the main Nissan plant. It would also result in the channelling of local trips through the A1290 Nissan site access signalised T junction, and so increase both demand and queuing, with resulting increases in noise and emissions

Our Response:

4.16 The Hub as submitted within the TEFP live application is, very clearly, sequentially preferable to the location as proposed within the AAP (August 2016) and the location is more central and easily accessible and visible from the A19, which is essential to attract and signpost the IAMP to national and international investment.

4.17 The location as proposed by the TEFP is within 750 m of all the proposed Employment Development and retains a suitable distance from the existing Nissan complex, allowing clear interaction between the two sites, which would be enhanced through the creation of suitable pedestrian, cycle and transport links.

4.18 The proposed Hub location in the live scheme was very carefully considered by TEFP to ensure that it would be accessible to pedestrians and therefore will ensure that short journeys to the Hub, as a focal point, are kept to a minimum by private car.

4.19 There is no reasoned justification or evidence for the re-located hub point and in fact does not represent a sustainable location for the IAMP AAP proposals as can be seen by considering the appended Reports from

1. WSP
2. Shandwick Properties

Policy T1: Highway Infrastructure - OBJECTION

Table 1 Infrastructure Delivery Schedule: Ref 4 & 5. – OBJECTION

4.20 The Policy as drafted identifies a number of improvements which are quoted at i-iv.

4.21 There is no certainty regarding Highways England plans; indeed there is significant slippage to the consultation document of the options that are proposed to upgrade the Downhill Lane junction. It is considered by TEFP that the entire masterplan is undeliverable until such time as the final HE project is confirmed. In fact, the deliverability of the HE Downhill lane scheme is not programmed to be complete until 2020, undermining the masterplan delivery as “a comprehensive scheme”.

4.22 The evidence base of the Transport Assessment (JMP 2016) refers to the following requirement “*The new bridge over the A19, as identified as a requirement for capacity in the ‘Washington Road Bridge Option Testing’ report, will provide a suitable connection between*

the AAP area and the local road network to the east of the A19. This bridge will cater for all modes of transport, including non-motorised users, and will enable a greater route choice for all modes of transport”.

4.23 There is insufficient evidence to justify the proposed new bridge that would go over the A19 and along the southern boundary of the TEF land as has been presented. In fact the IAMP masterplan does not show the bridge and so therefore we consider that this is misleading.

4.24 The AAP also fails to provide a costing for this bridge and other requirements are identified but not costed, and therefore we question the scheme delivery and would be challenging this as part of DCO scheme and process.

4.25 We object to the proposed inclusion of the A19 new bridge and request that it be deleted (Including reference in Table 1). It is unnecessary and unjustified, and at a cost which is unacceptable to the delivery of the wider AAP.

Policy T2: Walking Cycling and Horse Riding– OBJECTION

4.26 Policy T2 encourages walking, cycling and horse riding with the aspiration being for the IAMP to be an attractive sustainable environment seeking to create and encourage pedestrian movement. The location of the Hub as identified within the (August 2016) Publication Draft to the southern boundary of the site clearly conflicts with the Policy T2.

4.27 The Hub would be the key transport interchange as well as providing support facilities for the wider IAMP, due to these facilities being located at such a great distance 1.5 km it discourages walking and encourages the use of private modes of travel, which adds to the recirculation of traffic throughout the site adding to travel times, noise and emissions, all of which detract from the attractiveness of the IAMP as an investment.

Our Response:

4.28 We object to the position of the Hub as envisaged within the draft AAP. The logical location for the Hub is to have it centrally located. We request that the Hub is relocated to a central position as envisaged, in part, by the TEF submission for phase 1 with the transport hub element similarly located close to the A19 junction. The position of the hub which was previously promoted in an early consultation document (International Advanced Manufacturing Park – Green Belt and Site Selection Options 2015) was as follows and is the logical location;



The dashed line denotes the proposed relocated hub

4.29 The centralisation of the Hub will ensure that the transport nodes are logical to users and truly central to all future users of the wider IAMP. The central location will ensure that no part of the Hub is more than 750 metres from commuters.

Policy EN1: Landscape Design and Policy ENV3 Green Infrastructure – OBJECTION

4.30 The specific distances set out within both points i. & iii. (and Policy ENV3) are not considered reasonable or necessary as they are overly restrictive and will conflict with the IAMP Objectives set out in paragraph 2.7.

4.31 Policy EN1 and ENV3 does not align with any of the key indicators as set out within paragraph 2.7, namely Points 5, 10 & 12.

4.32 The specific distances (ENV3 i. 50 metre & ENV iii. 20 metre) would be overly restrictive to the delivery of sufficient land in the most appropriate locations to attract private sector investment. It would also conflict with the encouragement of design and development and would not ensure that opportunities are maximised to bring in both public sector and private sector funding.

Our Response:

4.33 The TEPF agree that screening and landscape buffers are important and should be identified within the AAP, but these should not be so explicit and restrictive. The intent and effective visual screening can be achieved without setting specific restrictive distances within the Policy. The intent of the Policy can still be achieved by identifying the important visual screens, which can be addressed upon submission of detailed schemes in the future. The wording of the Policy should be amended to ensure that a suitable (Proportionate) landscaping scheme is delivered.

4.34 Specifically in regard to the views from the A19, a Landscape Assessment has been carried out that refers to the A19 and the impact of visual amenity:

“Visual receptors likely to be less sensitive to changes in views or visual amenity (and so have lower sensitivity) include:

People engaged in outdoor sport or recreation which does not include or depend on appreciation of views;

People at their place of work whose attention is generally focussed on their work activities and not on their surroundings, or where the setting is not important to the quality of their working life; and

People travelling along roads where the main purpose is associated with routine day-to-day activities such as commuting, school runs, shopping or where the rate of travel means that the time exposed to the view is limited. “

(Provided by: Fairhursts, Stephen Goodchild. June 2016.)

4.35 The A19 is recognised as a visual receptor, though its importance, as set out above, is of a lower order when taken in the context of the impact of the green belt and the impact of the IAMP on its openness.

4.36 The visibility of the site is open when approached from the south for a short distance of approximately 250 metres until an existing bund rises and screens the site visually from the A19. Towards the southern end of the site it is proposed to create a landscape and wildlife corridor that runs along the length of the southern boundary with Nissan to the boundary with the A19. The depth and width at 25 metres would ensure that when approached from the A19 travelling north the site and structures on it will be screened until the southern landscaping strip is passed. The views are then interrupted again by the existing bund that would be enhanced as part of the detailed submission by [TEFP] NFTP. This would be repeated when travelling south along the A19 with only a fleeting view of the site glimpsed when travelling.

4.37 The landscaping would also be significantly enhanced at the point the bund rises above the level of the A19. The importance of landscaping at the entrance to the site is recognised at the junction of the A19 where it turns west to enter the site and the proposed landscaping would form a boulevard, creating an open, landscaped visual gateway to the Hub that is the central information point for direction to the wider IAMP and Nissan beyond.

5.0 Conclusion

5.1 TEFP is uniquely qualified to comment on the IAMP APP, particularly given the extent of the social, environmental and economic assessments that it has undertaken for the purposes of its own planning application, and its representation carries material weight as the freehold owner of a significant site within the indicative IAMP boundary.

5.2 We submit that the draft IAMP AAP in its current form is not sound. We have found that the plan has not been positively prepared and there are fundamental flaws in the evidence base for the reasons described above. TEFP submit that the proposals have not been objectively assessed and, as our findings have revealed, the correct and proportionate use of evidence as a base for preparing the AAP has been found lacking. TEFP instructed assessments of the highways impact of the proposed “hub” and a market analysis of the demand/ location of the commercial elements of the hub (Appendix 2).

5.3 The AAP proposals are aspirational and the principle of the proposals are accepted by TEFP. TEFP objections relate specifically to the viability and deliverability of the hub element

and do not avoid significant adverse impacts to the highway network. We have evidenced that the commercial element of the hub is also not deliverable.

5.4 The proposals are therefore not justified, the alternative proposals submitted as part of the TEPF application have not been considered positively as alternative options. As noted above TEPF are uniquely qualified to comment on the IAMP having undertaken a thorough assessment of potential impacts. The TEPF proposals including their hub element will reduce or eliminate impacts; and is consistent with national planning policy.

APPENDIX 1
Completed Consultation Responses

Appendix 2

Shandwick Developments Retail Response



Response To The Proposed Location Of The "Hub" Element Within The Draft International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP) Consultation Document Dated August 2016

1. Introduction

1.1 Shandwick Properties have been instructed by Town End Farm Partnership (TEFP) to comment upon the proposed location of the Hub element which is within the proposed International Advanced Manufacturing Park Area Action Plan dated August 2016.

1.2 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Shandwick Properties are based in the North East of England and specialise in out of town commercial retail destinations.

2. Proposal

2.1 IAMP is a proposed development aimed primarily at the automotive, advanced manufacturing and related distribution sectors. IAMP could be located on land to the north of the existing Nissan car manufacturing plant, to the west of the A19 and to the south of the A184. Within the IAMP site there would be a Hub area which has been defined within the AAP in Policy S6 as follows;

Policy S6: The Hub

A. Permitted uses for the Hub are specified in AAP Policy S5.

B. Proposals for the Hub, as shown on the IAMP AAP policies map, shall provide for:

- i. A multimodal transport interchange accommodating public transport, cycling and pedestrian access; and**
- ii. A higher density design compared to surrounding B2 and B8 uses to enable a concentration of required uses.**

C. Proposals for the Hub shall be guided by parameters specified in the IAMP Design Code, which shall be submitted as part of the DCO.

Policy S5 describes the Ancillary uses within the Hub as follows;

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[REDACTED]
[REDACTED]

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Policy S5: Ancillary uses

- A. To support the delivery of a sustainable scheme the following ancillary uses shall be permitted within the IAMP as part of the comprehensive scheme comprised in the IAMP DCO application:**
- i. education and training facilities;
 - ii. managed workspace (up to a total of 3,000 sq m gross floorspace);
 - iii. a range of local scale retail and leisure uses (up to a total of 1,500 sq m gross floorspace);
 - iv. nursery and child care facilities (up to a total of 1,000 sq m gross floorspace); and
 - v. a hotel with associated leisure and conference facilities.
- B. Ancillary uses associated with education, training, leisure and hotel uses shall be located within or next to 'the Hub' unless an alternative appropriate location within the IAMP development area can be demonstrated to be necessary, which does not undermine proposals for the principal uses.**
- C. Ancillary uses shall not prejudice the operation of Use Class B uses, including the expansion of operations.**
- D. In addition to the Hub location, small scale retail and leisure provision of up to 1,000 sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don.**

Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use.

2.2 The purpose of this Report is to comment primarily on the location of the Hub, and also to give opinion on the demand for additional retail and leisure space as proposed within section D of Policy S5.

2.3 The Hub itself is proposed to be located on the southern boundary of the proposed IAMP site between the Nissan site boundary and the A1290, as shown below in the draft IAMP site plan shaded light blue;



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SHANDWICK PROPERTIES

2.4 There is no indication on the plan as to where an additional site for retail and leisure use may be located. The AAP states that "the Hub for ancillary uses was located in the southern part of the area so it could be used by existing employees on the adjacent site and new employees at IAMP".

3. Opinion on Hub End Users

3.1 We largely agree with AAP proposals for the end use of the Hub. It makes good sense for retail and leisure uses to be complimented by nursery and childcare facilities, as well as a hotel and associated leisure and conference facilities. We would further comment that a car showroom use would be a natural choice for this location bearing in mind the end use of the whole of the IAMP site and would concentrate all of the commercial elements into one location, to create what has quite rightly been described as a Hub area.

4. Opinion on the AAP Proposed Location of the Hub

4.1 Within Policy S5 of the AAP it is stated that "Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use." There is no doubt of the need for a Hub, as has already been described within the proposed development and this would primarily serve a demand from the employees of the existing Nissan site and the new IAMP site.

4.2 To be successful in this kind of location, there are two elements which are vital to the success of such a development; visibility and accessibility. The proposed location of the Hub within the AAP on the southern boundary of the IAMP site does not fulfil either of these requirements. Customers of this kind are looking for convenience, they want to access the site quickly, make their purchase and exit the site with the least amount of delay. The proposed location of the Hub is approximately 1.3 kilometres from the northern part of the proposed IAMP site; this is way too far to expect a consumer to travel when wanting to make a convenience purchase. In addition, the lack of visibility of the site means it would be essentially hidden from any kind of passing trade. For most commercial uses a site has to be visible and easily found otherwise consumers will not make the effort to find it.

4.3 A much more visible and accessible Hub site is the one proposed by TEPL, which would be located to the northern west of their site. The proposed TEPL site is shown edged red in the location plan below;



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4.4 This site is very close to the A19 slip road entering the IAMP site. It is accessible directly from the A1290 and would be the ideal location for the proposed mix of commercial uses, especially the retail element.

4.5 TEPF has previously instructed this firm to gauge interest from national tenants to see which occupiers could be interested in a Hub type location within the IAMP site. When approaching these companies the location map above was used to show the location of the Hub, i.e. to the north of the TEPF site. The initial marketing was brief in time and limited in the amount of users approached; even so the response was very encouraging. The following companies expressed an interest in gaining representation within the Hub;

1. KFC
2. Coral Bookmakers
3. Greggs Plc
4. Spar Convenience Stores
5. InterContinental Hotel Group
6. BP
7. Marks and Spencer's

4.6 There is an undoubted demand from occupiers for space within a Hub area on the IAMP site. Crucially, when the occupiers above were asked to consider space within a Hub located on the southern boundary of the site as proposed within the AAP, all of them said that the accessibility and visibility of the site were not right for their requirements for such a destination location.

4.7 In our opinion, there is demand for a Hub on the site identified on the TEPF land, but not the AAP's proposed Hub location. Furthermore, the AAP's proposal that the Hub be based on the IAMP southern boundary and in addition an extra 1,000 sq m of retail and leisure space be located in the northern section of the IAMP is fundamentally flawed. There would not be the demand to fill space in both locations. It has been demonstrated that there would be little or no demand for a Hub on the southern boundary and so it would be important to have one commercial Hub, suitably located within an IAMP site. The TEPF site is the logical choice for this location.

5. Other Factors to Consider When Assessing Site Location

- i) Accessibility for IAMP employees – the AAP location of the Hub would be approximately 1.3 kilometres from the northern area of the IAMP site. This is considered to be too far for these employees to make the trip, especially during breaks within their working day. Employees should be encouraged to walk and cycle within the site and a return journey of 2.6 kilometres would be extremely prohibitive to this kind of activity and if the journey were to be made it would likely be by vehicular transport. The location of the TEPF Hub would be much more central to the site, being within circa. 750 metres of most of the IAMP site and still within an acceptable distance of the Nissan development.
- ii) Traffic Congestion – located next to the Nissan site it is believed that the Hub would create congestion of traffic when combined with the concentration of traffic entering and leaving the Nissan site. This would be especially apparent at shift change time within Nissan. The other point to note is traffic generated by delivery vehicles servicing the Hub location; they would further compound the traffic problem on the Nissan boundary. The TEPF location would alleviate the congestion problem.

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[REDACTED]
[REDACTED]

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- iii) Site Configuration – the proposed shape of the AAP Hub site does not appear to lend itself well to a commercial development. The “corner” location would potentially lead to a disjointed layout of buildings and access routes and could lead to a very inefficient use of the land.
- iv) Timescales and Deliverability – Policy S5 within the AAP states that delivery of the Hub should “match pace” with the take up of employment land. The TEPF Hub site is deliverable within this time period and would keep pace with the development of the employment land, certainly on the whole of the TEPF site. The land is largely flat, the access road runs passed the site, the demand is there for the space and there are no physical obstacles on the site to prevent development from starting. The AAP Hub is not straight forward. We are aware that there are third party owners and occupiers on the proposed Hub site and it would take considerable time and money to move these interested parties.

6. Conclusion

6.1 The proposed location of the Hub on the southern boundary of the IAMP site should not be the preferred location for such a development. Demand does exist for a Hub development consisting of a mixture of retail, leisure, childcare and hotel facilities. National companies have expressed an interest in such a development on the site. These companies, however, need a site that is both visible and accessible in order to make their operation commercially viable. The AAP proposed location fails both of these tests.

6.2 There would not be the demand for a main Hub location and an extra 1,000 sq m of retail and leisure space elsewhere on the IAMP site. One site should be created in a suitable location that is central within the IAMP site and is both visible and accessible for all.

6.3 The proposed southern boundary Hub site would inevitably suffer from traffic congestion, the site itself is a corner site and is poorly configured, which does not lend itself well to a commercial development and the timescales and deliverability of the site are both complicated, with no clear path on how or when the site could be delivered for development to commence.

6.4 The TEPF site is both visible and accessible. The demand for the site is proven. There would be no traffic issues. The site is clear and deliverable in a relatively short timescale. In our opinion, the TEPF proposed Hub site should be the preferred option for a commercial Hub use.

Shandwick Properties
21st August 2016.

Shandwick Properties Limited

[Redacted]
[Redacted]

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Appendix 3
WSP – Highways Analysis of Proposed AAP Hub

TRANSPORT note 2

**SUBJECT: Land North of Nissan Development and International
Advanced Manufacturing Park Area Action Plan August 2016**

DATE: 26 August 2016

Land North of Nissan

WSP | Parsons Brinckerhoff (WSP | PB) has recently prepared a Transport Assessment, Framework Travel Plan and Environmental Statement Chapter to accompany a hybrid planning application for a proposed mixed use development at Land North of Nissan (Washington), for our Client Town End Farm Partnership Limited (TEFP). This application (16/01341/FUL) was submitted to Sunderland City Council's Planning Department on 21st July 2016.

The proposed development at Land North of Nissan, as set out in the planning application (site plan attached as Appendix A), is as follows:

- **Unit A** : Manufacturing / Distribution Warehouse 27,870 sqm (1 storey);
- **Unit B**: Manufacturing / Distribution Warehouse 46,451 sqm (1 storey);
- **Unit C**: Manufacturing / Distribution Warehouse 27,414 sqm (1 storey);
- **Hub** consisting of the following:
 - **60no. bed Hotel** 5,630 sqm;
 - **Car Showroom** 1,250 sqm; and
 - **Ancillary Mixed Commercial/Retail** 2,195 sqm.

It is intended that the Manufacturing and Distribution units will be part of the Nissan supply chain. Our client has already identified end users for elements of the proposed development, one of which would be a relocation of an existing provider to Nissan, from the wider Sunderland area.

In order to maximise available capacity on the local highway network, our proposal is based on a strategy to ensure shift times do not coincide with the shift change schedule at Nissan – Nissan shift change is identified as being the local network peaks.

The proposed Hub, as set out in 16/01341/FUL, is considered to be well located to provide ancillary uses to the proposed development, but also to Nissan and the wider site proposed for the International Advanced Manufacturing Park (IAMP)

International Advanced Manufacturing Park Area Action Plan (AAP)

WSP PB has been instructed by TEPF to review the August 2016 (Draft) International Advanced Manufacturing Park Area Action Plan (IAMP AAP), with specific regard to the proposal to provide a Local Centre Hub to the south east of our client's development site.

The IAMP AAP provides the planning policy context for delivery of a development comprising of approximately 260,000 sqm of floorspace for automotive and other advanced manufacturing, engineering and related distribution businesses. Whilst our client acknowledges and welcomes the need for growth in industrial floor space, in the area surrounding the Nissan Manufacturing Plant, there are a number concerns in relation to the proposed location of the Local Centre Hub.

The approach for preparing an AAP for the IAMP development is supported by the Planning Inspectorate as it allows for full consideration of all issues and options to ensure the selected site is the most suitable

The Town End Farm Partnership encourage the proposals of the AAP to improve Pedestrian, Cyclist and Horse Riding facilities throughout the area (AAP Draft Policy T2) and will ensure the proposals at Land North of Nissan site are in accordance with this, in particular providing crossing points and access to the existing cycle overbridge to the south east of the site and shared pedestrian & cycle ways on the A1290.

The AAP includes two draft policies that are directly related to the proposed Local

Centre Hub; Policy S5 details the desired/acceptable ancillary uses to be developed as part of the IAMP proposals and is shown below:

Policy S5: Ancillary uses

A. To support the delivery of a sustainable scheme the following ancillary uses shall be permitted within the IAMP as part of the comprehensive scheme comprised in the IAMP DCO application:

- i. education and training facilities;
- ii. managed workspace (up to a total of 3,000 sq m gross floorspace);
- iii. a range of local scale retail and leisure uses (up to a total of 1,500 sq m gross floorspace);
- iv. nursery and child care facilities (up to a total of 1,000 sq m gross floorspace); and
- v. a hotel with associated leisure and conference facilities.

B. Ancillary uses associated with education, training, leisure and hotel uses shall be located within or next to 'the Hub' unless an alternative appropriate location within the IAMP development area can be demonstrated to be necessary, which does not undermine proposals for the principal uses.

C. Ancillary uses shall not prejudice the operation of Use Class B uses, including the expansion of operations.

D. In addition to the Hub location, small scale retail and leisure provision of up to 1,000 sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don.

Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use.

Policy S6 relates directly to the provision of a Local Centre Hub and is detailed below:

Policy S6: The Hub

A. Permitted uses for the Hub are specified in AAP Policy S5.

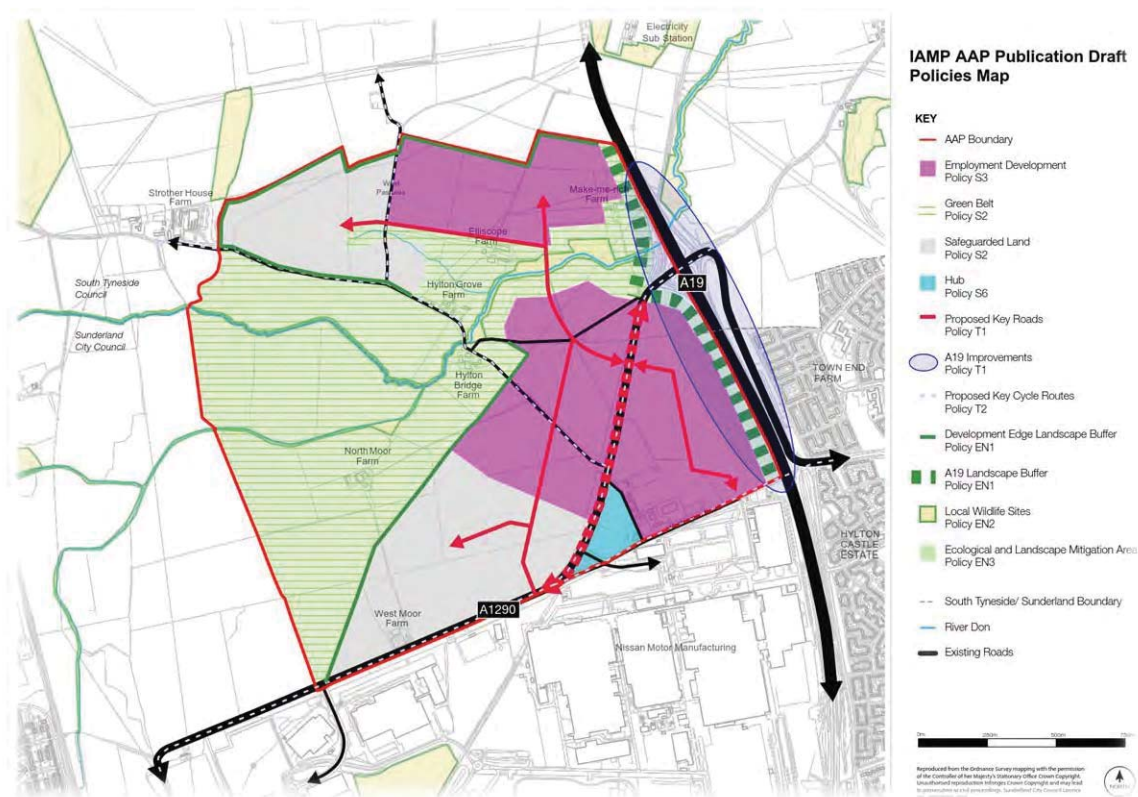
B. Proposals for the Hub, as shown on the IAMP AAP policies map, shall provide for:

- i. A multimodal transport interchange accommodating public transport, cycling and pedestrian access; and**
- ii. A higher density design compared to surrounding B2 and B8 uses to enable a concentration of required uses.**

C. Proposals for the Hub shall be guided by parameters specified in the IAMP Design Code, which shall be submitted as part of the DCO.

The stated purpose of the Local Centre Hub, within the AAP, is to create an ‘innovation district’ to help create an identity for the IAMP, providing a focal point and encouraging public transport provision and use including cycling and walking, by providing an identifiable node.

The proposed AAP layout is set out below:



The area adjacent to the southern boundary of the IAMP proposals, identified in blue shading, is the proposed location for the Local Centre Hub. This site lies to the south

west of the proposed TEFP Land North of Nissan development which is the subject of Planning Application Ref 16/01341/FUL.

Commentary on the AAP Local Centre Hub

The main concerns with regards to the proposed location of the Local Centre Hub are as follows:

- **AAP Hub Accessibility.**

Paragraph 2.7 (bullet point 11) of the AAP states the intention to create a 'central hub' for IAMP, however this hub is proposed in the southern most point of the Masterplan.

The area allocated for employment development (Policy S3) to the north of the Green Belt (Northern most point of IAMP site), is approximately 1.3km away from the proposed location of the Local Centre Hub (2.6km return journey). It is considered that this would make the ancillary retail uses difficult to reach for those working in the northern employment area (particularly during shift breaks/lunch – taking into account associated time restrictions). The Land North of Nissan development is proposing a hub with ancillary uses that would be located in a more central location to the wider IAMP site (within 750m of all proposed Employment Development), whilst retaining an acceptable distance from existing development, including Nissan.

In practice, it is considered that a reasonable walking distance is 2km (approximately a 25 minute walk). As such the TEFP hub, being located 1.5km from all IAMP developments, is considered much more sustainably located than the Local Centre Hub proposed in the AAP from some development) particularly when considering that the hub is proposing to provide ancillary uses to cater for the proposed development during shift breaks(coffee shops etc).

- **Impact at Nissan.**

It is intended that the Local Centre Hub, as set out in the AAP, will become the 'focal point' of the IAMP development, encouraging multi modal transport and additional public transport services. It is therefore considered that the proposed location of the Hub, at the main site access to Nissan, would have a significant impact in transportation terms.

Although the AAP does not provide development or predicted traffic flow details, it is considered likely that the resultant increase in traffic in the vicinity of the site, particularly from quick turnaround 2way trips to the hub facilities, would impede on the existing day-to-day operations of Nissan particularly at shift changes. It would also

channel local trips (including 2-way return trips to retail facilities) through the A1290 Nissan site access signalised T Junction, increasing traffic demand and queuing.

National Planning Policy Framework NPPF states that '*Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised*'; It is considered that the location of the IAMP Local Centre Hub would contravene this and increase movements, particularly in the vicinity of the most sensitive point on the local highway network, the site access to the Nissan manufacturing plant.

The Transport Assessment submitted as part of the TEFP Land North of Nissan site planning application assessed the operational capacity of the Nissan Site Access (both with and without the proposed Hub on the Land North of Nissan site); the results of the assessment demonstrate that this Hub location does not generate significant traffic impact at the Nissan site access. The results of the analysis (shown in the table overleaf) demonstrate that the junction works within efficient capacity in all scenarios, with a maximum Saturation of 79.6% in the worst case '2026 + Development Scenario 2' PM assessment period which includes Nissan network flows. To put this in context, Where a junction operates with a saturation of less than 90% it is considered to be working efficiently.

In conclusion, it is considered that the proximity of the proposed AAP Local Centre Hub to Nissan would have a greater impact on the day to day operations of Nissan than if it were located on the TEFP Land North of Nissan site.

- **Delivery Timescales.**

AAP Policy S5 states that the delivery of the Hub should 'match pace' with the take up of employment land - if less than 10% or greater than 90% has been delivered within 5 years (out with the pace of employment land take up) consideration should be made with regards to Policy S5. It is therefore assumed that the proposed AAP Local Centre Hub could take a significant amount of time to be fully developed. Given that the proposals at Land North of Nissan have already identified end users for the proposed development, and are committed to providing a Hub on site, the provision of such a Hub could be made available to the local employment area in much shorter timescales than the AAP Hub.

- **Environmental Draft Policies**

In accordance with Policy EN1, the location of the proposed Hub, as part of the TEFP Land North of Nissan proposals will allow for transport nodes in the vicinity of the site to be landscaped creatively in order to actively integrate the proposed development

within the existing countryside setting and reduce the impact of the proposed development on existing Public Rights of Way.

The proposed landscaping of the TEFP Land North of Nissan site includes green linkages along the main roads (A1290), with the inclusion of tree planting in the green buffered edges of the site; this will effectively screen the main roads and Public Rights of Way from the proposed development whilst incorporating a high level visual green infrastructure around the site, to encourage wildlife, visual amenity and health and wellbeing in line with AAP Draft Policy EN3.

MOVEMENT	2018						2026					
	AM Peak			PM Peak			AM Peak			PM Peak		
	Saturation (%)	MMQ (PCU)	PRC	Saturation (%)	MMQ (PCU)	PRC	Saturation (%)	MMQ (PCU)	PRC	Saturation (%)	MMQ (PCU)	PRC
	2018 BASE						2026 BASE					
A1290 WB - Left	38.1%	0		19.9%	0		42.4%	0		22.1%	0	
A1290 WB - Ahead	44.7%	6		48.4%	6		49.1%	7		53.4%	7	
Nissan - Left	12.5%	1	97.6%	19.3%	2	50.5%	13.9%	1	77.3%	21.5%	2	36%
Nissan - Right	45.6%	6		59.3%	9		50.7%	7		66.2%	11	
A1290 EB -Ahead	42.2%	6		59.8%	10		46.7%	7		66.2%	12	
A1290 EB - Right	25.5%	4		13.7%	2		28.3%	4		15.2%	2	
	2018 BASE + Scenario 1						2026 BASE + Scenario 1					
A1290 WB - Left	39.4%	0		21.3%	0		43.8%	0		23.4%	0	
A1290 WB - Ahead	54.7%	9		66.4%	11		60.1%	10		73.1%	12	
Nissan - Left	13.2%	1	60.8%	20.0%	2	30.9%	14.6%	1	49.6%	22.3%	2	19.4%
Nissan - Right	55.8%	7		68.5%	11		59.9%	8		74.1%	12	
A1290 EB -Ahead	51.6%	9		67.8%	13		57.0%	10		75.4%	15	
A1290 EB - Right	23.7%	3		13.6%	2		26.9%	4		15.3%	2	
	2018 BASE +Scenario 2						2026 BASE +Scenario 2					
A1290 WB - Left	39.4%	0		21.3%	0		43.8%	0		23.4%	0	
A1290 WB - Ahead	59.6%	10		73.1%	13		63.4%	8		79.6%	14	
Nissan - Left	13.2%	1	51.1%	20.0%	2	22.8%	14.6%	1	39.9%	22.3%	2	13.0%
Nissan - Right	58.0%	7		73.3%	11		64.3%	3		78.7%	13	
A1290 EB -Ahead	56.8%	11		69.0%	13		60.8%	8		76.3%	16	
A1290 EB - Right	23.2%	3		12.9%	2		25.7%	2.5		14.6%	2	

Conclusions

Overall it is considered that the proposed location of the Local Centre Hub, as set out in the AAP, is sequentially less favourable than the proposed Hub location on the Land North of Nissan development site (Planning Application Ref 16/01341/FUL). The AAP Hub would be outside of a realistic walking distance from the northern allocation of Employment Land (Policy S3), particularly for convenience trips to retail uses. This would not be the case with the proposed Hub at Land North of Nissan, which would be approximately 750m away from all IAMP proposed employment sites, and within walking distance of Nissan.

It is also considered that the proposed AAP Hub would have negative operational impacts on the existing site access of Nissan, due to proximity and with a 'focal point' and facilities that would draw local 2-way trips unnecessarily close to the existing Nissan Access. This would result in likely impact on the operation of Nissan, and increased queuing and vehicle delay at the A1290 Nissan Access. The proposed development at Land North of Nissan does not impede the operation of the Nissan Access as has been demonstrated in the Transport Assessment accompanying Planning Application Ref 16/01341/FUL.

The proposed delivery schedule of the AAP Local Centre Hub is dependent upon levels of future employment land take up; the proposals at Land North of Nissan are not dependant on IAMP land take up, as end users have already been identified, and, as such, can be delivered to much shorter timescales.

It is therefore considered that the Hub location set out as part of the Land North of Nissan application should be the preferred location for ancillary uses.

Overall, the proposals at the TEFP Land North of Nissan site are in accordance with the Draft AAP documentation and as such should be considered favourably.

An International Advanced Manufacturing Park (IAMP) for the North East Region

Area Action Plan Publication Draft
Consultation Response Form
August - September 2016



South Tyneside Council



The **International Advanced**

Manufacturing Park (IAMP) is a joint venture between Sunderland and South Tyneside Councils that is currently being considered for allocation as part of their Local Plans.

Located next to Nissan UK's Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and advanced manufacturing businesses to innovate and thrive.

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Email: iamp@southtyneside.gov.uk

Telephone: 0191 424 6257

Online: www.southtyneside.gov.uk/iamp

Post: Claire Harrison, Sunderland City Council, Project Office, Civic Centre, Burdon Rd, Sunderland, SR2 7DN **Email:** iamp@sunderland.gov.uk

Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iamp

1. Personal Details

Title	Mr
First Name	Peter
Last Name	Razaq
Company	
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

2. Agent's Details (only required if you're representing a third party) *If this question does not apply to you, please move on to question 3.*

Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
██████████	██████
██████████	████████████████████
██████	██████████
██████	██████████████
██████████	██████████
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██████████	████████████████████

3. Please give the number or name of the Paragraph or Policy your comment relates to.

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- www.sunderland.gov.uk/iamp

Paragraph	
Policy	S1

4. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

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Please tick

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

5. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input checked="" type="checkbox"/>
It is too negative	<input checked="" type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input checked="" type="checkbox"/>
It isn't consistent with national policy	<input checked="" type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.

Proposed Policy S1.B states that only the delivery of a single comprehensive scheme which meets the objectives of the IAMP AAP will be supported. What this means, following a review of the supporting text, is that the site should come forward as one proposal rather than "piecemeal" as envisaged by the draft Core Strategy. So the policy proposition is that anything other than comprehensive delivery (this is not explained) would be considered prejudicial to the delivery of the IAMP AAP objectives and overall delivery.

What Policy S1 and the objectives of the AAP fail to consider at all is the immediacy of delivery. The AAP covers demand and supply (evidenced in various documents including the Green Belt justification document and the PwC report) however it does not seek to address the clear immediate demand for employment floor space which cannot be

addressed by the DCO process. Only an immediate application (such as TEPF's current planning application for industrial accommodation to meet the existing and urgent needs of Nissan Tier 1 suppliers) is capable of comprehensively addressing the delivery of a floor space for immediate requirements in the market before the end of 2017.

We object to this policy as there is no evidence base to suggest that the joint authorities can control both the delivery of IAMP and the end users. There is a need for flexibility in the masterplan, given that delivery is over a 15 year period and a start date for the IAMP scheme is some years away. Further, there is no evidence base to suggest that a 100 hectare site can be delivered in accordance with the masterplan and phasing regime. By comparison, there is clear evidence of an immediate economic need for employment floor space which is unlikely to be satisfied if Policy S1 remains as currently drafted.

We therefore request that this draft emerging policy is clarified and amended to ensure that individual planning applications, such as the current planning application by TEPF, can be accommodated as part of a comprehensive development of the site. That is to say that the proposals which are AAP compliant should be classified as comprehensive development for the purposes of Policy S1.

The term "delivery of a single comprehensive scheme" requires clarification. This is unachievable and not supported by any evidence. It is assumed that this wording seeks to underpin the importance of the masterplan and the delivery proposals of De1 and 2 (Objections below). From a scheme delivery perspective there is no guidance to support the delivery of substantial applications made by anyone other than the scheme promoter (i.e. Sunderland City Council and South Tyneside Council).

These points are expanded on with attached document.

6. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	✓

Add a new policy or paragraph?

Please use this space to provide suggested revised wording of any of the policies or text.

Policy S1: Comprehensive Development

B. Only development that is consistent with the aims of the IAMP AAP will be supported.

- i) Ensure proposed development is designed and orientated to relate well to existing employment area and Enterprise Zone and established Infrastructure.
- ii) Demonstrate how the proposed development is consistent with the IAMP AAP and AAP proposals plan.
- iii) Include a phasing plan for the delivery of proposed development that demonstrates it would not conflict with the IAMP AAP.
- iv) Ensure that the proposed development is sustainable and able to mitigate its impact or proposed development would need to comply with delivery of Del2.



7. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

8. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

We, Town End Farm Partnership (TEFP), have ownership over a significant element (20 ha) of the land that is being allocated as part of the (100 ha) AAP. The policies proposed and the proposals map as submitted for consultation will have a significant impact on our land holding and the committed delivery. The land within the ownership of the NTFP has a developer who is committed and deliverable, in addition to a Hub that meets the Uses as set out in S5, these uses are both committed and deliverable.


Further the TEFP currently has an application lodged with Sunderland City Council (Ref: 16/01341/FUL that is material in the consideration of the AAP.

This Response is a summary of an accompanying document that is attached as an Addendum. The Addendum expands on the points raised and provides background supporting evidence to the points raised.

9. Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted	✓
When the Inspector's Report is published	✓
When the IAMP Area Action Plan Publication Draft is adopted	✓

10. Please complete the below.

Signature	
Date	4 October 2016



South Tyneside Council



An International Advanced Manufacturing Park (IAMP) for the North East Region

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Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iamp

4. Personal Details

Title	Mr
First Name	Peter
Last Name	Razaq
Company	Town End Farm Partnership
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

5. Agent's Details (only required if you're representing a third party) *If this question does not apply to you, please move on to question 3.*

Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
██████████	██████
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6. Please give the number or name of the Paragraph or Policy your comment relates to.

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You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:

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Paragraph	
Policy	S5

11. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- **Legal** – complies with the law
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- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please tick

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

12. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input checked="" type="checkbox"/>
It is too negative	<input checked="" type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input checked="" type="checkbox"/>
It isn't consistent with national policy	<input checked="" type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.



Drafted Policy S5 is confusing, and it does not provide the necessary certainty to deliver ancillary uses within the scheme. The small scale retail element is not sufficient to allow meaningful provision to entice national retailers to taking up floor space. NPPF paragraph 26 allows for up to 2,500 sqm (where there is no locally set threshold) of out of centre retail; anything above this requirement is considered as potentially having an impact on existing centres and therefore requires an impact assessment.

The Report by Shandwick Properties, appended to this Representation, provides market commentary on the proposals which are contained within the live planning application by TEF, and the Report includes an assessment of why such uses would not be successful outside of the proposed Hub element of the live planning application.

Policy S5 of the AAP states that the delivery of the Hub should match with the take up of employment land. It is therefore reasonable to conclude that the Hub will take some time to develop.

TEFP already have end users identified and those end users are committed to the provision of the Hub on-site and in a central location. This also assists in the attractiveness of the site for investment.

We request that the ancillary policy be amended to provide certainty to retailers as to the location of a hub, given the likely demand for their goods and an inclusion for a car showroom given that local manufacturers will want to showcase their product.

13. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	✓
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.



Drafted Policy S5: Ancillary Uses

- a. To support the delivery of a sustainable scheme the following ancillary uses shall be permitted within the IAMP:
- i) As written
 - ii) As written
 - iii) A range of local retail and leisure uses (up to a total of 2,500 sq metres gross floor space)
 - iv) As written
 - v) A hotel(s) to include conference facilities either separately or as a single delivery.
 - vi) Other appropriate uses shall be considered on their merits including car show room,

B. As written

C. As written

D. As written

Ancillary uses will be available for use to serve both the existing and new business within the locality as well as other users.

(This should be reflected in the Proposals Map).



14. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

15. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)



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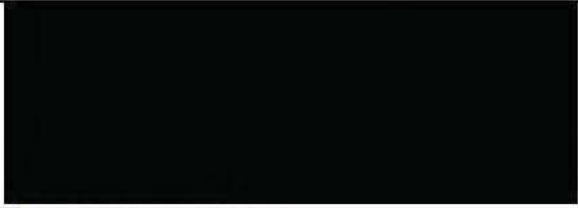
Further the TEFP currently has an application lodged with Sunderland City Council (Ref: 16/01341/FUL that is material in the consideration of the AAP.

This Response is a summary of an accompanying document that is attached as an Addendum. The Addendum expands on the points raised and provides background supporting evidence to the points raised.

16. Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted	✓
When the Inspector's Report is published	✓
When the IAMP Area Action Plan Publication Draft is adopted	✓

17. Please complete the below.

Signature	
Date	4 October 2016



South Tyneside Council



An International Advanced Manufacturing Park (IAMP) for the North East Region

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7. Personal Details

Title	Mr
First Name	Peter
Last Name	Razaq
Company	Town End Farm Partnership
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

8. Agent's Details (only required if you're representing a third party) *If this question does not apply to you, please move on to question 3.*

Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
██████████	██████
██████████	██
██████	██████████
██████	██████████████████
██████████	██████████

9. Please give the number or name of the Paragraph or Policy your comment relates to.

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- www.sunderland.gov.uk/iamp

Paragraph	
Policy	S6

18. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

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Please tick

Yes	
No	✓

19. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	✓
It is too negative	✓
It isn't justified i.e. there is no evidence to justify the policy	✓
It isn't consistent with national policy	✓
It doesn't comply with the law	

Please use this space to add any further comments.

Paragraph 2.7 of the IAMP Objectives sets out the 13 key indicators against which success will be measured.

Point 11 is to: Create a central hub to provide identity and encourage public transport. The proposed location of the Hub in the IAMP scheme, defined by Policy S6 and as illustrated in Appendix A, is clearly in conflict with the key indicator for a number of reasons:

The Hub is not central to the IAMP site, and due to the size of the IAMP the Hub will be in excess of 1.3 km from the employment development that is identified in Policy S3. Previous iterations of the plan illustrated the Hub to be more centrally located, however this location was considered unsuitable for reasons that included ecology and flood risk. The earlier iteration was clearly led by the obvious benefits of the Hub having a logical location centrally within the site, allowing it to be accessible and also equidistant for the wider IAMP scheme. It is acknowledged that in instances where a walking distance typically exceeds 750m, people may take the car, adding to the use of private vehicles within and around the site. This reflected in NPPF paras 29 – 30.

The legibility and visual impact of the Hub is also essential to its function. The August 2016 Publication Draft illustrates it being on the southern boundary with Nissan, and this would remove it from the key gateway (A19) and visually it would be detached and not an obvious Hub as the centre of activity for the wider IAMP site.

Rather, the location of the Hub as set out within the AAP would become a focal point; this is proposed to be at the main entrance to Nissan. This would undoubtedly have an adverse impact on transport and traffic. The resultant increase in traffic, which is encouraged through the Objectives of the IAMP, would have an impact on and impede the day to day activities and access and egress of the main Nissan plant. It would also result in the channelling of local trips through the A1290 Nissan site access signalised T junction, and so increase both demand and queuing, with resulting increases in noise and emissions

The Hub as submitted within the TEFP live application is, very clearly, sequentially preferable to the location as proposed within the AAP (August 2016) and the location is more central and easily accessible and visible from the A19, which is essential to attract and signpost the IAMP to national and international investment.

The location as proposed by the TEFP is within 750 m of all the proposed Employment Development and retains a suitable distance from the existing Nissan complex, allowing clear interaction between the two sites, which would be enhanced through the creation of suitable pedestrian, cycle and transport links.

The proposed Hub location in the live scheme was very carefully considered by TEFP to ensure that it would be accessible to pedestrians and therefore will ensure that short journeys to the Hub, as a focal point, are kept to a minimum by private car.

There is no reasoned justification or evidence for the re-located hub point and in fact does not represent a sustainable location for the IAMP AAP proposals as can be seen by considering the appended Reports from

1. WSP
2. Shandwick Properties



20. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	✓
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.



Policy S6: The Hub.

The Proposals map should be amended to show the Hub to be located to the north of the current location, at the entrance to the site from the A19.

21. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	✓
No	

22. If so, why do you feel this is necessary?

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23. Do you wish to be notified of any of the following? Please mark all that apply.

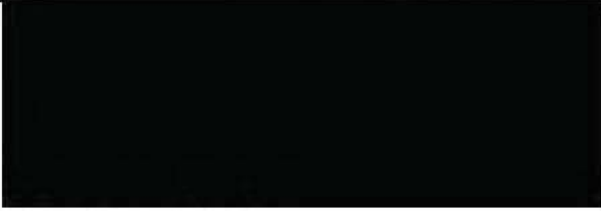
When the IAMP Area Action Plan Publication Draft has been submitted	✓
When the Inspector's Report is published	✓
When the IAMP Area Action Plan Publication Draft is adopted	✓

24. Please complete the below.



South Tyneside Council



Signature	
Date	4 October 2016

Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Submissions will be shared with external consultants, who are co-ordinating the AAP Publication Draft and consultation. Your name, organisation (if relevant) and comments may be made available to the public, in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be shared with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.



South Tyneside Council



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Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
██████████	██████
██████████	██
██████	██████████
██████	██████████████████
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██████████	██

12. Please give the number or name of the Paragraph or Policy your comment relates to.

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Paragraph	
Policy	T1

25. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

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- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please tick

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

26. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input checked="" type="checkbox"/>
It is too negative	<input checked="" type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input checked="" type="checkbox"/>
It isn't consistent with national policy	<input checked="" type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.

The Policy as drafted identifies a number of improvements which are quoted at i-iv.

There is no certainty regarding Highways England plans; indeed there is significant slippage to the consultation document of the options that are proposed to upgrade the Downhill Lane junction. It is considered by TEF that the entire masterplan is undeliverable until such time as the final HE project is confirmed. In fact, the deliverability of the HE Downhill lane scheme is not programmed to be complete until 2020, undermining the masterplan delivery as “a comprehensive scheme”.

The evidence base of the Transport Assessment (JMP 2016) refers to the following requirement “*The new bridge over the A19, as identified as a requirement for capacity in the ‘Washington Road Bridge Option Testing’ report, will provide a suitable connection between the AAP area and the local road network to the east of the A19. This bridge will cater for all modes of transport, including non-motorised users, and will enable a greater route choice for all modes of transport*”.

There is insufficient evidence to justify the proposed new bridge that would go over the A19 and along the southern boundary of the TEF land as has been presented. In fact the IAMP masterplan does not show the bridge and so therefore we consider that this is misleading.

The AAP also fails to provide a costing for this bridge and other requirements are identified but not costed, and therefore we question the scheme delivery and would be challenging this as part of DCO scheme and process.

We object to the proposed inclusion of the A19 new bridge and request that it be deleted (Including reference in Table 1). It is unnecessary and unjustified, and at a cost which is unacceptable to the delivery of the wider AAP.

27. What would you like to happen?



South Tyneside Council



Delete policy or paragraph?	
Amend policy or paragraph?	✓
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.

Policy T1: Highway Infrastructure.

ii). Should be deleted. In addition to reference to the bridge with Table 1.

28. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

29. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

We Town End Farm Partnership (TEFP) have ownership over a significant element (20 ha) of the land that is being allocated as part of the (100 ha) AAP. The polices proposed and the proposals map as submitted for consultation will have a significant impact on our land holding and the committed delivery. The land within the ownership of the NTFP has a developer who is committed and deliverable, in addition to a Hub that meets the Uses as set out in S5, these uses are both committed and deliverable.

Further the TEFPP currently has an application lodged with Sunderland City Council (Ref: 16/01341/FUL that is material in the consideration of the AAP.

This Response is a summary of an accompanying document that is attached as Addendum. The Addendum expands on the points raised and provides background supporting evidence to the points raised.

30. Do you wish to be notified of any of the following? Please mark all that apply.


When the IAMP Area Action Plan Publication Draft has been submitted	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the IAMP Area Action Plan Publication Draft is adopted	<input checked="" type="checkbox"/>



South Tyneside Council



31. Please complete the below.

Signature	
Date	4 October 2016

Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Submissions will be shared with external consultants, who are co-ordinating the AAP Publication Draft and consultation. Your name, organisation (if relevant) and comments may be made available to the public, in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be shared with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.



South Tyneside Council



An International Advanced Manufacturing Park (IAMP) for the North East Region

Area Action Plan Publication Draft
Consultation Response Form
August - September 2016

IAMP Area Action Plan Publication Draft Consultation

IAMP Area Action Plan Publication Draft - Consultation Response Form

The **International Advanced Manufacturing Park (IAMP)** is a joint venture between Sunderland and South Tyneside Councils that is currently being considered for allocation as part of their Local Plans.

Located next to Nissan UK's Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and advanced manufacturing businesses to innovate and thrive.

The AAP Publication Draft Documents can be found at the following links:

- www.southtyneside.gov.uk/iamp
- www.sunderland.gov.uk/iamp

This is the final opportunity to have your say ahead of the councils submitting plans to the Secretary of the State for public examination. This feedback form has been prepared in line with national guidelines to gather feedback on specific elements of the AAP, if you require further support, please contact us using the email addresses below.

All feedback should be returned by midnight on 26 September 2016 via:

Post: Sara Dunlop, South Tyneside Council, Head of Development Services, Town Hall & Civic Offices, Westoe Road, South Shields, NE33 2RL

Email: iamp@southtyneside.gov.uk

Telephone: 0191 424 6257

Online: www.southtyneside.gov.uk/iamp

Post: Claire Harrison, Sunderland City Council, Project Office, Civic Centre, Burdon Rd, Sunderland, SR2 7DN **Email:** iamp@sunderland.gov.uk

Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iamp

13. Personal Details

Title	Mr
First Name	Peter
Last Name	Razaq
Company	Town End Farm Partnership
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

14. Agent's Details (only required if you're representing a third party) *If this question does not apply to you, please move on to question 3.*

Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
█	█
█	████████████████████
█	█
█	██████████████
█	██████████
██████████████	██████████
██████████	████████████████████

15. Please give the number or name of the Paragraph or Policy your comment relates to.

For each policy that you would like to comment on, an individual form will need to be completed.

You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:

- www.southtyneside.gov.uk/iamp

Paragraph	
Policy	T2

32. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- **Legal** – complies with the law
- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please tick

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

33. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input checked="" type="checkbox"/>
It is too negative	<input checked="" type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input checked="" type="checkbox"/>
It isn't consistent with national policy	<input checked="" type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.

Policy T2 encourages walking, cycling and horse riding with the aspiration being for the IAMP to be an attractive sustainable environment seeking to create and encourage pedestrian movement. The location of the Hub as identified within the (August 2016) Publication Draft to the southern boundary of the site clearly conflicts with the Policy T2.

The Hub would be the key transport interchange as well as providing support facilities for the wider IAMP, due to these facilities being located at such a great distance 1.5 km it discourages walking and encourages the use of private modes of travel, which adds to the recirculation of traffic throughout the site adding to travel times, noise and emissions, all of which detract from the attractiveness of the IAMP as an investment.

We object to the position of the Hub as envisaged within the draft AAP. The logical location for the Hub is to have it centrally located. We request that the Hub is relocated to a central position as envisaged, in part, by the TEPF submission for phase 1 with the transport hub element similarly located close to the A19 junction. The position of the hub which was previously promoted in an early consultation document (International Advanced Manufacturing Park – Green Belt and Site Selection Options 2015) was as follows and is the logical location;



The dashed line denotes the proposed relocated hub

The centralisation of the Hub will ensure that the transport nodes are logical to users and truly central to all future users of the wider IAMP. The central location will ensure that no part of the Hub is more than 750 metres from commuters.

34. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	✓
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.

No proposed changes to the Policy. Though the Proposals map should reflect the Hub being located as illustrated below.





A large empty rectangular box, likely a placeholder for a document or image.

35. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	✓
No	

36. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

We Town End Farm Partnership (TEFP) have ownership over a significant element (20 ha) of the land that is being allocated as part of the (100 ha) AAP. The polices proposed and the proposals map as submitted for consultation will have a significant impact on our land holding and the committed delivery. The land within the ownership of the NTFP has a developer who is committed and deliverable, in addition to a Hub that meets the Uses as set out in S5, these uses are both committed and deliverable.

Further the TEFP currently has an application lodged with Sunderland City Council (Ref: 16/01341/FUL that is material in the consideration of the AAP.

This Response is a summary of an accompanying document that is attached as an Addendum. The Addendum expands on the points raised and provides background supporting evidence to the points raised.

37. Do you wish to be notified of any of the following? Please mark all that apply.


When the IAMP Area Action Plan Publication Draft has been submitted	✓
When the Inspector's Report is published	✓
When the IAMP Area Action Plan Publication Draft is adopted	✓



South Tyneside Council



38. Please complete the below.

Signature	
Date	4 October 2016

Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Submissions will be shared with external consultants, who are co-ordinating the AAP Publication Draft and consultation. Your name, organisation (if relevant) and comments may be made available to the public, in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be shared with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.



South Tyneside Council



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Located next to Nissan UK's Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and advanced manufacturing businesses to innovate and thrive.

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Email: iamp@southtyneside.gov.uk

Telephone: 0191 424 6257

Online: www.southtyneside.gov.uk/iamp

Post: Claire Harrison, Sunderland City Council, Project Office, Civic Centre, Burdon Rd, Sunderland, SR2 7DN **Email:** iamp@sunderland.gov.uk

Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iamp

16. Personal Details

Title	Mr
First Name	Peter
Last Name	Razaq
Company	Town End Farm Partnership
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

17. Agent's Details (only required if you're representing a third party) *If this question does not apply to you, please move on to question 3.*

Title	Mr
First Name	Sean
Last Name	Hedley
Job Title	Director
Organisation	Hedley Planning Services
█	█
█	████████████████████
█	█
█	██████████████
█	██████████
██████████████	██████████
██████████	████████████████████

18. Please give the number or name of the Paragraph or Policy your comment relates to.

For each policy that you would like to comment on, an individual form will need to be completed.

You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:

- www.southtyneside.gov.uk/iamp

Paragraph	
Policy	EN1

39. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- **Legal** – complies with the law
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- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please tick

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

40. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input checked="" type="checkbox"/>
It is too negative	<input checked="" type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input checked="" type="checkbox"/>
It isn't consistent with national policy	<input checked="" type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.

The specific distances set out within both points i. & iii. (and Policy ENV3) are not considered reasonable or necessary as they are overly restrictive and will conflict with the IAMP Objectives set out in paragraph 2.7.

Policy EN1 and ENV3 does not align with any of the key indicators as set out within paragraph 2.7, namely Points 5, 10 & 12.

The specific distances (ENV3 i. 50 metre & ENV iii. 20 metre) would be overly restrictive to the delivery of sufficient land in the most appropriate locations to attract private sector investment. It would also conflict with the encouragement of design and development and would not ensure that opportunities are maximised to bring in both public sector and private sector funding.

The TEFP agree that screening and landscape buffers are important and should be identified within the AAP, but these should not be so explicit and restrictive. The intent and effective visual screening can be achieved without setting specific restrictive distances within the Policy. The intent of the Policy can still be achieved by identifying the important visual screens, which can be addressed upon submission of detailed schemes in the future. The wording of the Policy should be amended to ensure that a **suitable** (Proportionate) landscaping scheme is delivered.

Specifically in regard to the views from the A19, a Landscape Assessment has been carried out that refers to the A19 and the impact of visual amenity:

“Visual receptors likely to be less sensitive to changes in views or visual amenity (and so have lower sensitivity) include:

- People engaged in outdoor sport or recreation which does not include or depend on appreciation of views;*
- People at their place of work whose attention is generally focussed on their work activities and not on their surroundings, or where the setting is not important to the quality of their working life; and*
- People travelling along roads where the main purpose is associated with routine day-to-day activities such as commuting, school runs, shopping or where the rate of travel means that the time exposed to the view is limited. “*

(Provided by: Fairhursts, Stephen Goodchild. June 2016.)

The A19 is a recognised as a visual receptor, though its importance, as set out above, is of a lower order when taken in the context of the impact of the green belt and the impact of the IAMP on its openness.

The visibility of the site is open when approached from the south for a short distance of approximately 250 metres until an existing bund rises and screens the site visually from the A19. Towards the southern end of the site it is proposed to create a landscape and wildlife corridor that runs along the length of the southern boundary with Nissan to the boundary with the A19. The depth and width at 25 metres would ensure that when approached from the A19 travelling north the site and structures on it will be screened until the southern landscaping strip is passed. The views are then interrupted again by the existing bund that would be enhanced as part of the detailed submission by [TEFP] NFTP. This would be repeated when travelling south along the A19 with only a fleeting view of the site glimpsed when travelling.

The landscaping would also be significantly enhanced at the point the bund rises above the level of the A19. The importance of landscaping at the entrance to the site is recognised at the junction of the A19 where it turns west to enter the site and the proposed landscaping would form a boulevard, creating an open, landscaped visual gateway to the Hub that is the central information point for direction to the wider IAMP and Nissan beyond.



41. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	✓
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.



Policy EN1 i) & 111) should remove reference to specific distances, ie 50 metres and 20 metres, it should be amended to read:

- i) Minimise the visibility of the development from the A19 and maintain an effective landscape buffer along the A19.**
- ii) No changes.**
- iii) Incorporate an effective landscaping buffer around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt.**

This should be reflected in the Proposal Map.

42. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	✓
No	

43. If so, why do you feel this is necessary?

(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

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44. Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted	✓
When the Inspector's Report is published	✓
When the IAMP Area Action Plan Publication Draft is adopted	✓




45. Please complete the below.



South Tyneside Council



Signature	
Date	4 October 2016

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Nigel Harrison on behalf of
Tyne & Wear Joint Local Access Forum



26 September 2016

Dear IAMP

Tyne and Wear Joint Local Access Forum
Advice on International Advanced Manufacturing Park (IAMP) Area Action
Plan (AAP)

I am writing on behalf of the Tyne and Wear Joint Local Access Forum. Thank you for consulting us on the International Advanced Manufacturing Park (IAMP). We are a statutory advisory body established under the Countryside & Rights of Way Act 2000 and our role is to advise on Public Rights of Way and the wider issue of improving access to and enjoyment of the countryside having regard to *“the desirability of conserving the natural beauty of the area “ ...”including the flora, fauna, and geological and physiological features .“*

This letter constitutes formal advice from the Tyne and Wear Joint Local Access Forum. South Tyneside and Sunderland City Councils as Planning Authorities are required, in accordance with Section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Forum in carrying out its functions.

Whilst generally supportive of the Area Action Plan (AAP), the forum would like to remind you of the presence of a number of Public Rights of Way in the vicinity of the proposed new development and since the proposals mean changes in the local area for people and wildlife we would hope that the potential to offer long term environmental and access improvement is designed in appropriately.

As an urban Access Forum, we are acutely aware of the value of pleasant countryside and good routes close to where people live and easily accessible without a long drive in a car. This area straddling the boundary of Sunderland and South Tyneside is part of a dwindling countryside within Tyne and Wear and as such is well used for recreational walking, cycling and horse riding. We are concerned that the proposed developments are likely to have an adverse impact during the years of implementation and in that regard we would like to see the closure of Follingsby Lane to motorised through-traffic a priority even if this is later relaxed for buses. We would encourage the provision of more links around

the periphery of the development to allow for circular routes and to provide off road routes. We note that the draft masterplan refers mainly to cyclists and fails to take the needs of horse riders and other non-motorised users into account. We also wish to see as many routes as possible modified to allow use for people with disabilities, which means that care should be taken with the design and location of gates, signage, level changes etc.

If you would like to discuss the above advice or need more information, please contact me using the details above or via our administrator. (Email

As a final point we are required to report on our performance each year to Natural England & DEFRA. Please would you please reply to this letter confirming what action will be or has been taken on the advice provided. If none please supply reasons.

Y



Nigel Harrison
Tyne and Wear Joint Local Access Forum

Claire Harrison
Sunderland City Council

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

Date: 26 September 2016
Our Ref: KLR0016/L003
By e-mail to: iamp@sunderland.gov.uk

Dear Ms Harrison

REPRESENTATIONS TO THE INTERNATIONAL ADVANCED MANUFACTURING PARK AREA ACTION PLAN – PUBLICATION DRAFT

On behalf of the W Gordon Proud Trust, Ms Diane Talbot and Buckley Burnett Limited (“the interested parties”) representations are made to the Area Action Plan Publication Draft (“AAP”) for the proposed International Advanced Manufacturing Park (“IAMP”).

Introduction

The Publication Draft of the IAMP AAP is the final draft document before the councils submit it to the Planning Inspectorate for examination. We understand comments provided will be reviewed and the AAP may be amended in response before submission.

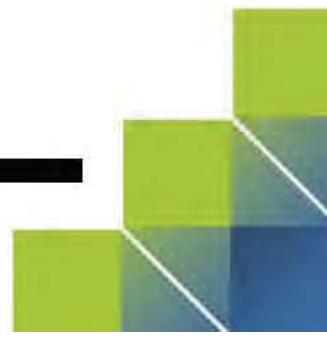
The interested parties have engaged through the consultation process having submitted comments to the Issues and Options Consultation in March 2015 and further more detailed representations to the Green Belt and Site Selections Options Consultation in February 2016.

The comments made in this letter follow the structure and headings used within the AAP.

The IAMP: Strategic Context, Vision and Objectives

The interested parties consider the IAMP will have a vital role to play in providing suitable land for the North East’s automotive and advanced manufacturing industries to underpin their continued success. It is also recognised that projects such as IAMP will contribute to achieving the objectives of the Government’s Northern Powerhouse Strategy and attract significant investment to the North East region to support economic growth. As such, the interested parties remain fully supportive of the business case for the IAMP.

[REDACTED]
[REDACTED]



The AAP notes in relation to site availability that the land in the IAMP AAP boundary is owned by a relatively small number of parties, many of whom own large areas. As such, as a last resort compulsory acquisition powers may be included in the Development Consent Order (DCO). Exercising use of the powers will be detrimental to the delivery of the IAMP project causing time delay and may be costly. This may put the project at risk and all efforts should be made by the scheme promoters to negotiate with owners.

Appraisal of options

Of the three options that formed the basis of the consultation on the Green Belt and Site Selection Options Paper, the interested parties supported Option 2 as it was considered to have benefits which would not be realised by the other two options including; connectivity to the highway network, reducing traffic congestion and providing greater access to the local workforce; the opportunity for the first phase of development close to the Nissan plant which would include the hub. The existing road network would support the initial phase without significant expenditure on highway infrastructure.

The publication draft AAP has selected Option 1 as the preferred option as the basis with amendments to incorporate elements from Options 2 and 3 including:

- The area of safeguarded land being relocated from the north of the employment area to the west of the site to maintain a strategic gap in the Green Belt to prevent coalescence between Sunderland and South Tyneside; and
- The hub for ancillary uses relocated to the southern part of the site so it can be used by existing employees and new employees at IAMP.

With these amendments to Option 1, the interested parties support the preferred option now selected.

Strategic Policies

Policy S1 of the AAP which states the IAMP will be delivered only as a single comprehensive scheme is supported and is necessary to clearly demonstrate exceptional circumstances for releasing land from the Green Belt. A masterplan for the IAMP is welcomed together with a phasing plan, although there is a balance to be struck in providing sufficient detail to assist development without being too prescriptive that the operational requirements of potential developers / occupiers are not able to be met.

Land uses

Policy S3 states the principle use for the IAMP is employment development directly relating to the automotive and advanced manufacturing sectors for production, supply chain and distribution activities. This reflects the vision and is aligned with the objectives for the IAMP as stated at paragraph 2.7 of the AAP. The policy does allow for Use Class B2 and B8 employment development from other sectors although this is only acceptable subject to satisfying a number of criteria. It is considered critical, particularly in the early phases of development, that the focus for development is the automotive supply chain and related advanced manufacturers only. Otherwise there is the potential

for the IAMP to simply become a large employment site which does not then succeed in achieving the vision and objectives and for which there are no exceptional circumstances for releasing Green Belt.

In terms of protecting the IAMP AAP area from other uses, the policy states at criterion D. proposals for residential development and development outside those stated in Policy S5 shall not be permitted. The policy text then makes reference to large scale retail or leisure uses above 1,500sqm gross not being acceptable. This is not entirely consistent with Policy S5 in that the floorspace threshold of 1,500sqm gross referred to in this policy is for *'a range of local scale retail and leisure uses (up to a total of 1,500sqm gross)'*. The wording of Policy S5 infers there will be a number of smaller retail units, such as bank, newsagent, sandwich shop, coffee shop, rather than one unit of 1,500sqm. The policy text for Policy S3 should be reviewed and amended to clarify matters. The reference is to large scale retail or leisure. How has the threshold of 1,500sqm gross been determined as a definition of 'large' for a single unit? There are retailers that may be drawn to the site whose gross floorspace is less than 1,500sqm.

Policy S4 details the mix of uses with up to 24,000sqm of employment space for B1(a) and B1(b) considered acceptable where it is in support of the Principle Uses specified in Policy S3. As Policy S3 allows for general B2 and B8 uses, for sectors other than the automotive supply chain and related advanced manufacturers, the provisions of Policy S4 therefore allows for general B1(a) and B1(b) development to sit alongside. As Policy S4 is currently worded, there is potential for 24,000sqm of general office and research and development floorspace to be development within the IAMP that is not connected with the automotive supply chain and related advanced manufacturers which seems to be in conflict with the objectives of the IAMP in that any B1(a) and B1(b) development should be to support the automotive supply chain and related advanced manufacturers. It is considered some general office development is acceptable but the primary focus should remain on office space to support the automotive supply chain.

Outside of the B Class Uses, complementary ancillary uses are necessary to support the delivery of the IAMP as a sustainable development. As evidenced in successful industrial locations such as Team Valley in Gateshead, with reference to MainGate, complementary ancillary uses typically include small shops, cafes, banks, training and conference facilities, hotels, child-care facilities and gyms. The purpose is to provide business related facilities required by occupiers / tenants to assist with the operation of their business and also for employees to make use of before starting work, after work and during breaks.

Policy S5 criterion A. specifies the ancillary uses that will be acceptable within the IAMP comprising:

- i. Education and training facilities;
- ii. Managed workspace (up to a total of 3,000sqm gross);
- iii. A range of small scale retail and leisure uses (up to a total of 1,500sqm gross);
- iv. Nursery and child-care facilities (up to a total of 1,000sqm); and
- v. A hotel with associated leisure and conference facilities.

Specifying the acceptable ancillary uses within the policy provides clarity. However, it is considered that it should be made clear that any education and training facilities must relate to the automotive sector and the associated supply chain only otherwise the intention of the policy is lost and it is open to misinterpretation.

The wording of criterion B. of Policy S5 is confusing for two reasons. At criterion A. education, training, leisure and hotel uses are stated as acceptable and this is clear. However, criterion B. states "Ancillary uses associated with education, training, leisure and hotel uses shall be located within or next to 'the Hub' unless an alternative appropriate location within the IAMP development area can be demonstrated to be necessary..." (underlining – own emphasis).

Firstly, it is not clear what exactly ancillary uses associated with education, training, leisure and hotel uses are. Secondly, the location of where within the IAMP the development of the stated ancillary uses are acceptable is confusing, particularly with reference to Policy S6: The Hub which states the permitted uses for the Hub are specified in AAP Policy S5. The wording of the policies S5 and S6 need to be carefully considered. As currently drafted, it is not clear in reading criterion B. of Policy S5 whether there will be a defined boundary so there is a distinction between being 'within or next to' the Hub.

The interested parties support the principle of ancillary uses within the IAMP area and the uses specified at criterion A. of Policy S5. It is considered the ancillary uses should only be provided at the Hub, in the location shown on the Policies Map at Appendix A of the AAP, otherwise the purpose of the hub and the benefit of locating the ancillary facilities together is diluted and lost.

Given this, criterion D. of Policy S5 which allows further retail and leisure provision of up to 1,500sqm gross north of the River Don should be deleted. The criterion is contrary to the vision and objectives for the IAMP. It is also the case that the location of the hub was shown at the centre of the scheme adjacent to the River Don on Option 1 at the Site Selection Options stage but, as stated in the Exceptional Circumstances for Releasing Land from the Green Belt – Technical Background Report (paragraph 6.3.7.1), the preferred option relocated the hub, as the location for ancillary uses, to the southern part of the area so it can be used by existing employees on the Nissan site adjacent as well as the new employees within the IAMP.

The final sentence of Policy S5 states "*Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use.*" Furthermore, within the second paragraph of the policy justification reference is made the ancillary facilities being accessible and beneficial to "*the residents of surrounding residential areas.*" As stated above, the purpose of including ancillary facilities within the IAMP area is to serve existing workforce at Nissan and the future workforce of the IAMP. The purpose is not to provide a facility for local residents and divert trade away from the shops and services being used in the community.

Given the comments made above, we suggest Policy S5 as currently worded is not effective and should be amended to read:

“Policy S5: Ancillary uses

- A. *To support the delivery of a sustainable scheme the following ancillary uses shall be permitted to form the ‘Hub’ within the IAMP area, in the location shown on the Policies Map, as part of the comprehensive scheme comprised in the IAMP DCO application:*
 - i. *Education and training facilities to support the automotive supply chain and related advanced manufacturers;*
 - ii. *Managed workspace (up to 3,000sqm gross floorspace);*
 - iii. *A range of local scale retail units (Use Classes A1, A2 and A3) and leisure uses (up to a total of 1,500sqm gross floorspace);*
 - vi. *Nursery and child-care facilities (up to a total of 1,000sqm); and*
 - iv. *A hotel with associated leisure and conference facilities.*
- B. *Ancillary uses shall not prejudice the operation of uses within Use Class B including the expansion of operations.*
- C. *Ancillary uses will be provided to serve the existing businesses in the locality and new businesses within the IAMP area.”*

Reference to *“the residents of surrounding residential areas.”* in the policy justification should also be removed.

Policy S6: The Hub is supported subject to the suggested amendments made above to Policy S5. However, the first sentence of the policy justification states the Hub *“performs the role of a local centre within the IAMP AAP.”* It is noted that reference to the Hub being a ‘local centre’ is also made in paragraph 3.3.2.5 of the Planning Policy Technical Background Report. As commented upon above, the purpose of forming a ‘hub’ of ancillary uses within IAMP area is to provide facilities for the existing and future workforce. The ‘hub’ of ancillary uses should not seek to perform the role of a local centre. The use of the term ‘local centre’ will cause confusion as it has a particular definition when referring to retail planning policy. In the glossary of the National Planning Policy Framework, references to town centres also applies to local centres. Whilst it is understood any centre has to be identified as such in Local Plans, otherwise it does not constitute a town centre, it is necessary to distinguish the ‘hub’ as ancillary uses that would not be acceptable unless forming part of the comprehensive scheme. We strongly suggest the words ‘local centre’ are removed from the publication draft AAP.

Phasing, implementation and infrastructure delivery

A phasing strategy for the comprehensive delivery of the IAMP as required by Policy Del1 is supported, with the project being led by investment in and provision of infrastructure for the whole site. However, the strategy should identify and prioritise areas within the IAMP that can be developed immediately where land is accessible from the existing highway network, utility services can be

provided easily and there is limited mitigation required. This would primarily be land to the east and west of the A1290 which connects the A19 to the north of the Nissan plant including the 'hub'. It is understood the phasing strategy will be required as part of the IAMP DCO application. On behalf of the interested parties, it is requested the councils make the phasing strategy available for review and comment before submission as part of DCO application.

Securing mitigation

Policy Del2 states mitigation required as a result of the IAMP will be secured through articles and requirements within the IAMP DCO and / or by planning obligation, as appropriate. In terms of planning obligations, Table 1 provided in the AAP sets out the infrastructure interventions required to mitigate the impact of development, with developer contributions identified towards local cycle routes (Item 7) and plot level landscape works (Item 16) for individual development proposals. It not absolutely clear whether there are likely to be any other contributions sought above and beyond the two items listed, as the content of Table 1 is not referenced in the Policy wording. Clarification regarding this needs to be made.

There is no reference in this section to Community Infrastructure Levy and the relationship between this and the IAMP, should the councils seek to adopt CIL through the local plan process. This needs to be clarified in the IAMP AAP.

Appendix B – Monitoring Framework

In line with comments made above regarding Policy S6, the wording within the Monitoring Framework relevant to this Policy on page B4 should be amended. The title of Policy S6 stated here is "Local Centre" which should be changed to be consistent with the title of the policy on page 19 stated as "The Hub".

The contingency stated in the framework for Policy S6 is to "*monitor the delivery of the Hub. The scale of delivery should 'match pace' with the take up of employment land.*" This is wholly inconsistent with the purpose of the 'Hub' being to allow existing employees the opportunity to access the facilities and services. It is therefore the case that the Hub can be delivered immediately and should not 'match pace' with the development of the IAMP area. The wording with the Monitoring Framework should be amended to ensure consistency.

Attendance at the Examination in Public

As changes are sought to the IAMP AAP by the interested parties, we wish to attend the examination in public to express the views made within the representations.

Furthermore, we wish to be notified:

- When the IAMP AAP Publication Draft is submitted;
- When the Inspector's Report is published; and
- When the IAMP AAP Publication Draft is adopted.

We trust the content of this letter will be given due consideration and the AAP amended to reflect it.
If the council wishes to discuss any aspect of the above, please call me.

Yours sincerely



Karen Read
BA (Hons) DipTP MRTPI
Director

klr Planning Ltd



170816/WANLESS/005



An International Advanced Manufacturing Park (IAMP) for the North East Region

**Area Action Plan Publication Draft
Consultation Response Form
August - September 2016**



South Tyneside Council



IAMP Area Action Plan Publication Draft Consultation

IAMP Area Action Plan Publication Draft - Consultation Response Form

The **International Advanced Manufacturing Park (IAMP)** is a joint venture between Sunderland and South Tyneside Councils that is currently being considered for allocation as part of their Local Plans.

Located next to Nissan UK's Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and advanced manufacturing businesses to innovate and thrive.

The AAP Publication Draft Documents can be found at the following links:

- www.southtyneside.gov.uk/iamp

- www.sunderland.gov.uk/iamp

This is the final opportunity to have your say ahead of the councils submitting plans to the Secretary of the State for public examination. This feedback form has been prepared in line with national guidelines to gather feedback on specific elements of the AAP, if you require further support, please contact us using the email addresses below.

All feedback should be returned by midnight on 26 September 2016 via:

Post: Sara Dunlop, South Tyneside Council, Head of Development Services, Town Hall & Civic Offices, Westoe Road, South Shields, NE33 2RL

Email: iamp@southtyneside.gov.uk

Telephone: 0191 424 6257

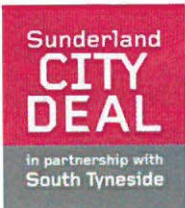
Online: www.southtyneside.gov.uk/iamp

Post: Claire Harrison, Sunderland City Council, Project Office, Civic Centre, Burdon Rd, Sunderland, SR2 7DN

Email: iamp@sunderland.gov.uk

Telephone: 0191 561 1467

Online: www.sunderland.gov.uk/iamp



South Tyneside Council



1. Personal Details

Title	MISS
First Name	DANIELLE
Last Name	WANLESS
Company	
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

2. Agent's Details (only required if you're representing a third party)

If this question does not apply to you, please move on to question 3.

Title	
First Name	
Last Name	
Job Title	
Organisation	
Address Line 1	
Address Line 2	
Town	
County	
Post Code	
Telephone Number	
Email Address	

3. Please give the number or name of the Paragraph or Policy your comment relates to.

For each policy that you would like to comment on, an individual form will need to be completed.

You can find details of the policies/paragraph number in the AAP Publication Draft Documents via the following links:

- www.southtyneside.gov.uk/iamp
- www.sunderland.gov.uk/iamp

Paragraph	
Policy	

4. Do you support this policy or paragraph? (i.e. do you think it is sound and/or legally compliant)

To meet the legal requirements, the Planning Inspector will test whether the plan has been prepared legally and is therefore considered to be sound, this means:

- **Legal** – complies with the law
- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so, and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please tick

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

5. If no, please chose from the options below why do you not support the policy/paragraph?

It won't work i.e. not effective	<input type="checkbox"/>
It is too negative	<input type="checkbox"/>
It isn't justified i.e. there is no evidence to justify the policy	<input type="checkbox"/>
It isn't consistent with national policy	<input type="checkbox"/>
It doesn't comply with the law	<input type="checkbox"/>

Please use this space to add any further comments.

I am not good at understanding jargon in the policies & paragraphs, however I would like to express my concerns in regards to the IAMP ~~being~~ proposal & the site of construction, [redacted] & I am concerned that the construction will ~~effect~~ have a negative impact on [redacted], not only during the



building process but in the long term, i.e, noise, traffic, the appearance of the IAMP. Please consider the residents if this goes ahead, but I would prefer if this was built elsewhere.

6. What would you like to happen?

Delete policy or paragraph?	
Amend policy or paragraph?	
Add a new policy or paragraph?	

Please use this space to provide suggested revised wording of any of the policies or text.



South Tyneside Council



7. For those seeking changes to the plan, would you like to attend the examination in public to express your views?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>


8. If so, why do you feel this is necessary?

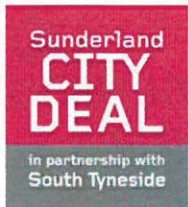
(Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.)

9. Do you wish to be notified of any of the following? Please mark all that apply.

When the IAMP Area Action Plan Publication Draft has been submitted	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the IAMP Area Action Plan Publication Draft is adopted	<input checked="" type="checkbox"/>

10. Please complete the below.

Signature		
Date	17/8/16	



South Tyneside Council



Please note that all responses will be held by the Council in accordance with the Data Protection Act 1998. Submissions will be shared with external consultants, who are co-ordinating the AAP Publication Draft and consultation. Your name, organisation (if relevant) and comments may be made available to the public, in council committee papers and as otherwise considered appropriate by us. Your personal data i.e postal addresses, emails and telephone numbers will not be shared with the public.

However, your contact details will be shared with the Programme Officer & Inspector for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

Appendix 2: Withdrawn Representations and Statements of Common Ground

Gateshead Council

**International Advanced Manufacturing Park Area
Action Plan (IAMP AAP) Examination**

Statement of Common Ground

as agreed between

Sunderland City Council;

South Tyneside Council; and

Gateshead Council

January 2017

Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council, South Tyneside Council and Gateshead Council.
- 1.2 The Statement sets out the confirmed points of agreement between the Councils with regard to the submitted International Advanced Manufacturing Park Area Action Plan (IAMP AAP) 2017-2032.

Background

- 2.1 Sunderland and South Tyneside Councils ('the Councils') have been working jointly to prepare the IAMP AAP which will establish the planning policy framework for the delivery of a new International Advanced Manufacturing Park on land to the north of the existing Nissan manufacturing plant.
- 2.2 In August 2016, the Councils published the Publication draft of the IAMP AAP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.3 In response to this statutory consultation, Gateshead Council submitted a draft formal response to the draft plan on 26 September 2016. Following this, a subsequent email was received on 13 October to advise that this draft response had now been approved Gateshead Council's Cabinet and should therefore be treated as a formal response. A copy of this response received on 26 September 2016 can be found at Appendix 1.
- 2.4 The consultation response emphasised Gateshead Council's support in principle for the IAMP project, and acknowledged the economic benefits an IAMP can bring to the North East Region. However, consultation on the publication draft IAMP AAP highlighted a number of areas where Gateshead Council considered revisions to policies were necessary to make the plan sound.
- 2.5 In order to address these concerns, the Councils have proposed a number of minor modifications to the AAP. Table 1 shows how each of these comments has been addressed, either through proposed minor modifications to the AAP or through other mechanisms beyond the scope of the AAP, which will require ongoing cooperation between Gateshead Council, South Tyneside Council and Sunderland City Council. A schedule of the proposed modifications resulting from Gateshead's submission is set out in Section 3.1 of this statement.

Table 1: The Councils' Response to Objections

Summary of Comment/Objection	Response and Areas of Ongoing Cooperation
<p>Policy S2 did not indicate how, when assessing the need for future release of safeguarded land, the Councils will determine whether there is sufficient land within the IAMP's allocated employment areas to accommodate development needs. The monitoring framework within Appendix B provided a contingency measure for monitoring the implementation of policy S2, but this did not provide a clear mechanism for how the capacity of the IAMP will be reviewed after five years of the project's implementation. Gateshead Council suggested that the AAP includes criteria which will be used to assess future development needs, and that these criteria include assessing the availability of employment land within Gateshead.</p>	<p>The Monitoring Framework has been updated to clearly set out how and when consideration will be given to the release of the safeguarded land. Uptake will be monitored on an annual basis and once 50% of the site has been developed, a review of the AAP will be undertaken to determine if it is necessary to release the safeguarded land for development.</p>
<p>Policy S3 did not make clear what the 'principal uses' are, and it was considered that the policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would reduce its contribution to supporting growth in advanced manufacturing and automotive sectors. In addition, criterion B.iii. required applicants to demonstrate 'that there are no alternative, suitable locations' that could accommodate proposals for non-principal uses. Gateshead Council would like the text to be amended to make it explicit that any appraisal should include potential development sites in Gateshead.</p>	<p>Minor modifications have been proposed to Policy S3 to set out a clear definition for what the Principal Uses are. Further minor modifications to the policy have also been proposed to ensure that premises are retained for their original use in the long term.</p> <p>A key objective of the IAMP is to provide industrial floorspace for production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, situated in close proximity to the Nissan manufacturing plant. The proposed modifications would remove criterion B relating to proposals for non-Principal Uses. Consequently it would not be appropriate to include specific reference to assessing the availability of 'alternative, suitable locations' within Gateshead.</p>
<p>Policy S4 does not indicate floorspace area(s) of individual units. Furthermore, the AAP indicates that it 'will facilitate provision of a range of unit sizes to encourage companies of varying scales to</p>	<p>The IAMP needs sufficient flexibility to enable it to meet the requirements of all users within the Principal Uses. Whilst it anticipated that the majority of development will be taken up by large floorplate users, it is considered that it</p>

<p>locate on the site'. It is Gateshead Council's view that the majority of IAMP's premises should be larger units, which would be more consistent with the IAMP vision. The policy should be amended on this basis.</p>	<p>would be overly restrictive to place any minimum requirement on the size of individual units.</p>
<p>Further clarity is needed in policies S5 and S6 on how it is planned to control the location and quantity of ancillary uses.</p>	<p>Minor modifications have been proposed to merge Policies S5 and S6 to offer greater clarity regarding the Hub and Ancillary Uses. The revised policy clearly sets out which use classes would be acceptable and the scale of development which would be appropriate. The revised policy also indicates that ancillary uses shall only be permitted in 'The Hub', with small scale provision within the Northern Employment Area. Minor modifications are also proposed to the Policies Map, which clearly show the location of the Hub and Northern Employment Area referred to within the policy.</p>
<p>The protection and enhancement of the River Don corridor should be a key design principle for the IAMP, set out within Policy D1. A requirement to protect and enhance the River Don Corridor would also be consistent with the approach to development at the South of Follingsby Lane site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan.</p>	<p>Protecting the River Don Corridor is already identified as key masterplan objective within the AAP and Policy D1 requires any proposals to demonstrate compliance with all of the IAMP AAP Design Objectives.</p> <p><i>Area of ongoing cooperation</i></p> <ol style="list-style-type: none"> <i>Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.</i>
<p>The Transport Technical Background Report does not provide detail on the transport modelling work that has been undertaken. Gateshead Council wish to review this evidence prior to establishing whether they are satisfied with the approach to mitigating the IAMP's traffic impacts.</p>	<p>Following submission of Gateshead Council's response to consultation on the IAMP AAP the Councils have shared traffic modelling work for Gateshead Council's consideration.</p> <p><i>Area of ongoing cooperation</i></p> <ol style="list-style-type: none"> <i>Transport Planners from Gateshead Council have provided feedback regarding IAMP traffic modelling, and the Councils have agreed to provide more detail on the impacts of the IAMP on the local road network.</i> <i>The Councils will provide Gateshead Council with the Draft Nexus Public</i>

<p>Policy T2 should emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.</p> <p>Whilst supporting the approach set out within Policy T3 with regard to the enhancement of bus services to and from the IAMP, Gateshead Council are keen to engage with both Councils to discuss the potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.</p> <p>Policy IN2 should be strengthened by replacing the word 'minimises' with 'prevents'. The policy should also require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy. A further opportunity could be realised if Policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead.</p> <p>Gateshead Council would support revisions to the wording of policy EN2 to provide a more robust approach requiring the protection and enhancement of ecological assets through development of the IAMP. In Gateshead Council's view, it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don</p>	<p><i>Transport Study following its presentation to the City Deal Board.</i></p> <p>A minor modification has been proposed to criterion A(i) of Policy T2 so that it is ensured that any junction / highway measures and any new roads are designed to safely integrate potential pedestrian and cycle movements. In addition, a minor modification is proposed to criterion A(ii) of Policy T2 to ensure that roads and spaces are designed to consider the needs for all types of users so that conflict between road users and vulnerable users is minimised.</p> <p>The detail regarding potential bus links to Gateshead will be considered as part of the DCO process, however the Councils will continue to work closely with Gateshead Council with regard to proposed public transport improvements to the IAMP.</p> <p>A minor modification has been proposed to criterion C of Policy IN2 to require the scheme promoter to provide SuDS to [amongst other things] provide multifunctional benefits to wildlife, landscape and water quality.</p> <p><i>Area of ongoing cooperation</i></p> <ol style="list-style-type: none"> Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor. <p>Minor modifications have been proposed to Policy EN2 to require the proposals to maintain and enhance biodiversity and protect wildlife habitats by [amongst other things] maintaining and enhancing the River Don as a functional ecological corridor.</p>
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corridor is to be protected, and this should be made clear within policy EN2.

Area of ongoing cooperation

1. Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.

Agreed matters

- 3.1 In agreement with Gateshead Council; Sunderland City Council and South Tyneside Council propose the following minor modifications to the IAMP AAP (new text shown in bold):

Policy S3: Principal Uses

- A. ~~Through the DCO application, Consent shall be granted for employment development, in the allocated employment areas on the policies map~~ **production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors. These are the Principal Uses for IAMP.**, ~~where the intended uses directly relate to the automotive and advanced manufacturing sectors for production, supply chain and distribution activities.~~
- B. **To ensure premises are retained for their original permitted use in the long term, the DCO shall contain requirements to that effect or the Councils may consider making a direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 to that effect.**
- C. ~~Employment development proposals from other sectors for B2 uses and B8 uses shall only be acceptable where:~~
 - i. ~~demand for this other type of use to be located within the IAMP can be clearly demonstrated through market demand analysis; and~~
 - ii. ~~it can be demonstrated that this type of use is not detrimental to the operation or known needs of the principal uses and the objectives of the IAMP AAP or to the comprehensive development of the IAMP; and~~
- D. ~~it can be demonstrated there are no alternative, suitable locations~~
- E. ~~Development consent for B2 and B8 uses should be granted subject to DCO requirements to ensure premises are retained for the original permitted use in the long term.~~
- F. **C. Proposals for residential development and development outside of the parameters as set out within Policy S5, shall not be permitted.**
- D. **Proposals for retail and leisure uses outside of the Hub as shown on the Policies Map shall not be permitted, with the exception of the modest scale ancillary uses in the Northern Employment Area (denoted by an 'N' on the Policies Map).**

Deletion of Policies S5 and S6 of the Publication draft and their replacement with one amalgamated Policy with supporting text, as set out below:

4.3.3: The Hub and Ancillary Uses

Policy S5: The Hub and Ancillary Uses

- A. **To support the delivery of a sustainable scheme the following ancillary uses shall be permitted to form 'The Hub', in the location shown on the Policies Map as part of the comprehensive development of IAMP:**
 - i. **A hotel (Use Class C1) (up to 150 beds) with associated leisure and conference facilities;**

- ii. Education and training facilities (Use Class D2 (c)) to support the Principal Uses;
 - iii. Managed workspace for micro and start-up business (Use Class B1a) up to cumulative total of 3,000sqm gross floorspace), which is in addition to the total floorspace allowance set out for Principal Uses set out in Policy S4;
 - iv. Nursery and child-care facilities (up to cumulative total of 1,000sqm gross floorspace);
 - v. A range of small scale retail units (Use Class A1 and A3) up to cumulative total of 1,500sqm gross floorspace, with no single unit being greater in size than 250sqm gross; and
 - vi. A multi-modal transport interchange accommodating public transport, cycling and pedestrian access.
- B. The Hub should provide for higher density development compared to the surrounding employment uses in IAMP, to enable a concentration of permitted uses.
- C. The Hub shall be the primary location for ancillary uses. Provision for small scale retail provision (A1) up to a cumulative total of 1,000 sqm gross floorspace will be permitted within the Northern Employment Area, to support the Principal Uses, with no single unit being greater in size than 250sqm gross.

The vision for the IAMP is for ‘a planned and sustainable employment location’. For this vision to be realised, the IAMP should include ancillary uses to provide an attractive working environment and meet the needs of a skilled workforce. Ancillary uses associated with retail, leisure and hotel facilities and space for education and training provision will be necessary to meet the vision and objectives for the IAMP.

Complementary ancillary uses are required within the IAMP AAP area to allow existing and new employees the opportunity to access facilities and services locally, making the development more sustainable. These facilities may also be accessible and beneficial to employees in the adjacent Nissan complex and the residents of surrounding residential areas, but are primarily to serve the employment uses.

The Hub is located in the south of the AAP area, bordering the A1290 in order for existing employees at Nissan and related current supply chain to access the facilities and transport interchange easily and to also integrate an existing business, the Horseshoe Public House into the Hub offer.

This approach is in accordance with the NPPF, which emphasises the importance of sustainable development through the creation of ‘a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being’. Therefore, it is important for the IAMP AAP to include provision to meet the needs of the business community at the IAMP and ‘secure a good standard of amenity for all existing and future occupants of land and buildings’.

Policy D1: Masterplan Design

- A. Proposals for the IAMP **should demonstrate how they** ~~shall be supported where they~~ reflect the following key design principles:
- i. A hierarchical street network connected to existing roads and key transport corridors featuring a central boulevard and primary routes to prioritise access from the A19 and

- integrate the ~~n~~**Northern Employment Area** part of the IAMP north of the River Don with service networks to encourage efficient movement;
 - ii. Drainage infrastructure to be accommodated within the street network with sustainable urban drainage systems (SuDS) placed to enable effective water **quality** management;
 - iii. Orientation of buildings along the boulevard and primary routes to follow a common building line fronting on to the road, with buildings along the River Don corridor ~~fronting onto~~ **facing towards** the river and landscaping uses where possible; and
 - iv. **Have special regard to preserving and enhancing their significance, including any contribution made by their setting, of heritage assets within and in proximity to the site**, including ~~Give consideration to the setting of listed buildings such as~~ 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.
- B. Compliance with the IAMP AAP design objectives shall be demonstrated by the scheme promoter through the submission of a Design Code **as part of the DCO application**.

Policy T2: Walking, ~~C~~ycling and ~~H~~orse Riding

- A. Walking and cycling in and around the IAMP shall be ~~encouraged~~**required** by:
- i. Ensuring that any junction / highway measures and any new roads are designed to **safely integrate** ~~be mindful of~~ potential pedestrian and cycle movements. New routes should seek to ensure that they reflect pedestrian / cycle desire lines and are of a high quality;
 - ii. Ensuring that roads and spaces are designed **to consider the needs of all types of users** so that conflict between road users and vulnerable users is minimised;
- D. **Where new routes abut agricultural land, appropriate measures to deter public access to agricultural land shall be incorporated.**

Policy T3: Public ~~T~~ransport

- A. **Development of** the IAMP shall promote and facilitate public transport measures including:

Policy IN2: Flood ~~r~~Risk and ~~d~~rainage

- B. A detailed Flood Risk Assessment (FRA) and Water Framework Directive Assessment are required **to accompany development proposals**. ~~Alongside the DCO application or subsequent applications.~~
- C. A surface water drainage strategy shall be prepared which complies with national design standards and local policy. The scheme promoter shall be required to provide Sustainable Drainage Systems (SuDS) capable of ensuring that run-off from the site (post-development) does not exceed corresponding greenfield rates, minimises pollution, **provides multifunctional benefits to wildlife, landscape and water quality** and is effectively managed with clear ownership in place.
- D. ~~The scheme promoter for the comprehensive development of IAMP and applicants shall demonstrate~~ **Sufficient capacity both on and off-site in the foul sewer network to support development should be demonstrated**. Where insufficient capacity exists, plans for sewer upgrades should be delivered prior to the occupation of development within the IAMP AAP area.

submission. Ongoing cooperation regarding ecological connectivity and water quality along the River Don is required to address issues that the Councils consider cannot be addressed within the scope of the IAMP AAP. With regard to transport infrastructure, ongoing cooperation is required to share information regarding traffic impacts of the IAMP which (due to the tight timescales required in preparing the IAMP AAP) had not been resolved prior to the submission of the IAMP AAP. The relationship between the areas of ongoing cooperation and Gateshead Council's response to consultation on the Publication Draft IAMP AAP are identified within table 1. Detail on the agreed areas of ongoing cooperation are set out below:

Areas of ongoing cooperation:

1. *Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.*

Working in partnership with the Environment Agency, Gateshead Council, South Tyneside Council and Sunderland City Council will prepare a coordinated policy approach to enhancing the water quality of the River Don, and protecting and enhancing ecological connectivity along its corridor. The three local authorities intend for these policy measures to be contained within emerging Local Plan documents.

2. *Transport Planners from Gateshead Council have provided feedback regarding IAMP traffic modelling. The Councils have agreed to provide more detail on the impacts of the IAMP on the local road network by the end of March 2017.*


Following the submission of Gateshead Council's response to consultation on the Publication Draft IAMP AAP, the Councils have shared traffic modelling information with Gateshead Council. Following feedback, the Councils have agreed to provide further details regarding the impacts of the IAMP on Gateshead's road network. After reviewing this information Gateshead Council aim to advise on whether the proposed approach to mitigating the IAMP's traffic impacts, particularly in relation to potential impacts on Gateshead, are appropriate.


3. *The Councils will provide Gateshead Council with the Draft Nexus Public Transport Study by the end of March 2017, following its presentation to the City Deal Board.*


The Draft Nexus Public Transport Study will provide an indication of the potential for improving public transport access to the IAMP. Understanding the potential public transport improvements will inform Gateshead Council's consideration of the potential accessibility of the IAMP for Gateshead residents and aid cooperation on the development of these options going forward.

- 3.3 Gateshead Council, South Tyneside Council and Sunderland City Council are satisfied that the proposed modifications to the IAMP AAP, combined with a commitment to ongoing work identified within the areas of ongoing cooperation, appropriately address the issues raised in Gateshead Council's response to consultation on the Publication Draft IAMP AAP.

Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		24/01/2017

Signed on behalf of South Tyneside Council		
Name and position	Signature	Date
George Mansbridge Head of Development Services		24/01/2017

Signed on behalf of Gateshead Council		
Name and position	Signature	Date
Anneliese Hutchinson Service Director, Development and Public Protection		24/01/2017

Appendix 1: Gateshead Council response to consultation on the Publication Draft IAMP AAP



www.gateshead.gov.uk

Iain Fairlamb
Sunderland City Council
Civic Centre
Burdon Road
Sunderland
SR2 7DN

26 September 2016

Dear Iain,

RE: Consultation on the Publication Draft International Advanced Manufacturing Park Area Action Plan

Thank you for providing us with the opportunity to comment on the publication draft Area Action Plan (AAP) for the International Advanced Manufacturing Park (IAMP). An IAMP has potential to be of national significance in terms of its economic impact, and could play a major role in the development of the North East economy over the next decade and beyond. In recognition of the potential wide-ranging implications of this project, and the requirement for local authorities to work together on cross-boundary issues under the duty to cooperate, Gateshead Council wishes to submit a response to consultation on the publication draft IAMP AAP. As consultation on the publication draft AAP is a formal stage of the plan preparation process, this letter is provided in addition to relevant representation forms, which are enclosed with this letter.

Successful implementation of the IAMP project, through delivery of development which meets the vision and objectives for the IAMP, will make a positive contribution to economic growth in Sunderland and South Tyneside, and the wider region. Policies of the emerging IAMP AAP will be the primary means by which Sunderland and South Tyneside Councils can guide and support the successful and sustainable delivery of the IAMP. The scale and location of the IAMP means that it has potential to have a significant impact on economic development within Gateshead. The successful application of robust policies relating to the IAMP will therefore make a positive contribution to economic growth within our area. Through reviewing the publication draft AAP, we have identified a number of areas where we consider

some improvements could be made to policy wording to enable the AAP to be more effective.

This formal stage of consultation on the AAP requires a consultation form to be completed setting out suggested changes to specific policies or paragraphs, and seeks that consultees indicate whether they consider the AAP to be sound and legally compliant on this basis. The restrictions of the consultation response form (requiring respondents to indicate they either consider a policy or paragraph to be 'sound' as written, or whether they consider some changes are required, and the policy or paragraph is therefore 'unsound') mean that, for our suggested amendments to policies to be regarded appropriately through the consultation process and subsequent examination of the AAP, we have needed to indicate that we consider a number of policies to be 'unsound'.

The IAMP has potential to have implications for Gateshead's economic growth, and this consultation is the first opportunity we have had to consider the Councils' draft policies for an AAP. Through this consultation response we would like to recommend a number of revisions to the proposed policies which we consider could improve their effectiveness, particularly in relation to the potential impacts on Gateshead. However, we would like to make clear that, as noted in our previous responses to consultation on emerging proposals for the IAMP, Gateshead Council is supportive of this project, and we regard the overarching vision and broad policy approach to development at the IAMP to be appropriate. We consider that when taken as a whole, our suggested amendments to the draft IAMP AAP policies amount to relatively minor modifications which, if taken forward would improve the clarity of the Councils' emerging policy approach to development of an IAMP.

Strategic Policies

Policy S2 sets out the Councils' approach to designating Green Belt and safeguarded land. Criterion B states: "*Areas of safeguarded land shall only be released for development through a review of the AAP, where it can be demonstrated that there is insufficient land within the allocated employment areas to accommodate development needs.*" Although the criterion makes clear that a revision of the IAMP AAP is the only means by which safeguarded land can be released for development, neither the policy nor its supporting text give an indication of how the Councils will determine whether there is sufficient land within the allocated employment areas to accommodate development needs. The monitoring framework provided within Appendix B identifies a contingency measure for monitoring the implementation of this policy (and the trigger for a review of the IAMP AAP), stating: "*If 50% of the land is taken up by year 5, then consider an early review of the AAP to release the safeguarded land*". However, this approach does not appear to provide a clear mechanism for how the capacity of the IAMP will be reviewed after year five of the project's implementation.

The future release of safeguarded land (50ha) at the IAMP could have significant implications for economic development in the wider area, and for Gateshead's policy approach to the provision of employment land. In our view, the policy would benefit from increased clarity regarding which criteria need to be fulfilled before a review of the IAMP AAP would be deemed necessary. Inclusion of some criteria within policy S2 or its supporting text (rather than the current reference within the monitoring

framework table) would also aid transparency. In our view, appropriate criteria would establish how future development needs at the IAMP will be determined, and set out how these needs will be considered against the remaining capacity of land within the IAMP.

Policy S2 and the approach to monitoring this policy appear to refer only to an exploration of the demand for, and supply of employment land within the allocated employment areas of the IAMP. Notwithstanding the specific sectors that will be the focus of development at the IAMP, in our view a more effective assessment of the need to release safeguarded land would consider the supply of suitable and deliverable employment land in other nearby locations, including those within Gateshead. Such an approach would be in keeping with the Duty to Cooperate, and would aid in minimising the potential displacement effects of the IAMP project. Considering the supply of employment land in nearby areas will be of particular relevance if development within the IAMP's allocated employment areas contains occupiers operating outside of the automotive and advanced manufacturing sectors.

Land Uses

Policy S3 aims to establish the principal uses that will be located within the IAMP. Supporting text to the policy notes that, in order to protect against potential future changes to permitted development rights, the long term uses of the IAMP for the automotive and advanced manufacturing sectors will be secured through a requirement in the Development Consent Order (DCO). Providing a robust and unambiguous planning framework for the uses that are to be located within the IAMP is likely to be a key factor in its success as a strategically important employment location. Accordingly, we consider that policy S3 should more clearly specify the principal uses that will be considered appropriate within the IAMP. Implementing the IAMP vision will mean the development of the IAMP primarily for B2 and B8 uses, and these Principal Uses should be clearly defined within the AAP policy. Clearly identifying the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses "*as set out in policy S3*".

Criterion B of policy S3 aims to establish criteria which will be used to assess where development proposals not associated with automotive or advanced manufacturing sectors will be acceptable. For proposals to be considered acceptable, criterion B.iii. requires applicants to demonstrate "*that there are no alternative, suitable locations*" that could accommodate the proposal. The AAP does not indicate the geographic area that should be used in the assessment of alternative, suitable locations. Given the IAMP's close proximity to Gateshead, and a number of our employment areas, we consider the policy would be more effective if it is made clear that assessments of suitable, alternative locations should include an appraisal of potential development sites in Gateshead.

Policy S4 identifies the mix of uses (in terms of amount of floorspace) that will be accommodated within the IAMP. Although the policy sets the total amount of floorspace for employment (B use class) uses within the IAMP, the policy does not indicate floorspace area(s) of individual units. Supporting text to the policy notes: "*The IAMP AAP will facilitate provision for a range of unit sizes to encourage companies of varying scales to locate on the site. This approach offers the*

opportunity for business growth within the development to encourage future sustainability". We recognise the potential benefits of supporting the development of businesses located within the IAMP, and also acknowledge the need to accommodate a range of unit sizes within the IAMP to cater for the needs of different businesses. However, in our view, it would be appropriate for the majority of the IAMP's premises to be larger units capable of attracting and accommodating larger occupiers. An approach of focussing on the provision of larger premises, capable of accommodating established businesses would be in keeping with the IAMP's vision of establishing "A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries", and would also support the objective of attracting "European-scale 'super suppliers'". Provision of a relatively high proportion of larger units would also support the use of the IAMP by businesses operating in the automotive and advanced manufacturing sectors, reinforcing the Councils' approach of concentrating development within these specific sectors.

Policy S5 aims to establish the Councils' approach to ancillary uses within the IAMP. Ancillary uses will provide an important supporting function within the IAMP; however, if left unchecked, there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, inappropriate development of retail and leisure uses within the IAMP could be detrimental to the project, and could detract from its contribution to economic growth. Accordingly, a clear and succinct policy is required to control the location and quantity of ancillary uses. We consider the current structure of policy S5 results in some ambiguity regarding the appropriate quantity and location of ancillary uses within the IAMP.

Criterion A of policy S5 sets out the type and quantity of ancillary uses that will be acceptable within the whole of the IAMP, and states: "*To support the delivery of a sustainable scheme the following ancillary uses shall be permitted **within the IAMP** [our emphasis] as part of a comprehensive scheme comprised in the IAMP DCO application*". The criterion goes on to specify the total quantity of floorspace that will be permitted for some ancillary uses, including a total of 1,500sq m for retail and leisure uses.

Criterion B specifies that ancillary uses of education, training, leisure and hotel uses shall be accommodated within or next to the Hub. Although supporting text to policy S6 suggests that the Hub will be a key location for retail uses, restaurants and cafés, such uses are not mentioned within criterion B of policy S5.

Criterion D of policy S5 states: "*In addition to the Hub location, small scale retail and leisure provision of up to 1,000sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don*". Criterion D of this policy (unlike criterion A) does not make clear whether the amount of ancillary floorspace specified is the total quantity of floorspace that will be permitted, or the maximum area that will be acceptable for a single unit. Assuming that criterion D sets out the total retail and leisure floorspace that will be acceptable within the northern part of the IAMP, applying this alongside criterion A suggests that there will only be 500sq m of retail and leisure facilities within the Hub location, which does not seem appropriate for its status as the 'focal point' for ancillary facilities.

An unambiguous policy framework guiding the location and quantity of ancillary uses within the IAMP as a whole, and within the Hub location specifically would contribute to a more effective policy, and we respectfully suggest that revisions are made to improve the clarity of policy S5.

Design

Policy D1 provides key design principles that will be used to shape the IAMP. Given the sensitivity of the River Don to nearby development, we suggest that protection and enhancement of the River Don corridor should be a key design principle for the IAMP, set out within policy D1. Effective water management and provision of landscape and ecology buffers will support this principle, as would a requirement for the proposed bridge crossing to be sensitively designed to minimise its impact on the River Don corridor. A requirement to protect and enhance the River Don Corridor would also be consistent with the policy approach Gateshead Council has taken to development at the South of Follingsby Lane employment site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP).

Highway Infrastructure

Policy T1 relates to the mitigation of the highways impacts of the IAMP. The Councils have published a Transport Technical Background Report to support consultation on the publication draft AAP; however, this report does not provide detail on the transport modelling work that has been undertaken. Through ongoing dialogue, South Tyneside Council and Sunderland City Council have agreed to share this more detailed evidence on transport modelling with Gateshead Council. Once we have received and had the opportunity to review this evidence, we hope to be in a position to advise on whether we consider the approach to mitigating the IAMP's traffic impacts is appropriate, particularly regarding the potential impacts on Gateshead.

Walking, Cycling and Horse Riding

Policy T2 sets out the Councils' emerging policy on non-motorised transport at the IAMP. If sustainable transport options are to be optimised within the IAMP, and within this part of the region, policies should seek to firmly integrate sustainable transport options within developments. The current approach within policy T2, particularly within criterion A.i. and A.ii. places focus on accommodating cycleways and footpaths around planned changes to the highways network, rather than highlighting the importance of establishing a high-quality, integrated sustainable transport network. We would support changes to policy T2 which emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.

Public Transport

Policy T3 sets out the approach that will be taken to promote and facilitate public transport servicing the IAMP. We support the enhancement of bus services to and from the IAMP, and are keen to engage with both Councils to discuss potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.

Flood Risk and Drainage

Policy IN2 includes requirements to provide SuDS features within the IAMP. Criterion C requires that “...run-off from the site (post development) does not exceed corresponding greenfield rates, minimises pollution and is effectively managed with clear ownership in place”. While we support the principle of this policy, we consider that its requirements regarding pollution should be strengthened, by replacing “minimises” with “prevents”. The policy also presents an opportunity to support the multifunctional benefits of SuDS, and should require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy.

A further opportunity for the IAMP to compliment the development of the South of Follingsby Lane site could be realised if policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead. This approach would support the wider catchment management and ecological connectivity of the River Don.

Ecology

Policy EN2 seeks to establish policies which will protect and enhance the ecological value of the IAMP. As referred to in our comments relating to draft AAP policies D1 and IN2, the River Don corridor provides a valuable shared ecological resource which spans areas of Gateshead, South Tyneside and Sunderland. The mobile nature of protected species also means that development within the IAMP has potential implications for biodiversity within Gateshead. In this respect, Gateshead Council would support a strong policy approach to protecting and enhancing Local Wildlife sites and ecological connectivity through development of an IAMP. We recognise that policies of the AAP will be applied alongside those contained in the Councils’ other Local Plan documents. However, we would support revisions to the wording of policy EN2 to provide a more robust policy approach requiring the protection and enhancement of ecological assets through development of the IAMP.

Supporting text to policy EN2 states: “*Priority will be given to mitigating effects [on ecological assets] within the IAMP boundary, however in certain cases it may be necessary to provide offsite mitigation*”. In our view it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don corridor is to be protected, and this should be made clear within policy EN2.

Summary

If the potential benefits of an IAMP for Sunderland, South Tyneside, and the wider region are to be delivered, effective cooperation with key stakeholders will be of fundamental importance. Gateshead Council welcomes the opportunity to contribute to the IAMP’s success through active participation in this process.

Yours Faithfully,



Neil Wilkinson

Spatial Planning and Environment
Development & Public Protection
Communities and Environment
Gateshead Council

Iain Fairlamb
Sunderland City Council



26 September 2016

Dear Iain,

RE: Consultation on the Publication Draft International Advanced Manufacturing Park Area Action Plan

Thank you for providing us with the opportunity to comment on the publication draft Area Action Plan (AAP) for the International Advanced Manufacturing Park (IAMP). An IAMP has potential to be of national significance in terms of its economic impact, and could play a major role in the development of the North East economy over the next decade and beyond. In recognition of the potential wide-ranging implications of this project, and the requirement for local authorities to work together on cross-boundary issues under the duty to cooperate, Gateshead Council wishes to submit a response to consultation on the publication draft IAMP AAP. As consultation on the publication draft AAP is a formal stage of the plan preparation process, this covering letter is provided in addition to relevant representation forms, enclosed with this letter.

Successful implementation of the IAMP project, through delivery of development which meets the vision and objectives for the IAMP, will make a positive contribution to economic growth in Sunderland and South Tyneside, and the wider region. Policies of the emerging IAMP AAP will be the primary means by which Sunderland and South Tyneside Councils can guide and support the successful and sustainable delivery of the IAMP. The scale and location of the IAMP means that it has potential to have a significant impact on economic development within Gateshead. The successful application of robust policies relating to the IAMP will therefore make a positive contribution to economic growth within our area. Through reviewing the publication draft AAP, we have identified a number of areas where we consider some improvements could be made to policy wording to enable the AAP to be more effective.

This formal stage of consultation on the AAP requires a consultation form to be completed setting out suggested changes to specific policies or paragraphs, and seeks that consultees indicate whether they consider the AAP to be sound and legally compliant on this basis. The restrictions of the consultation response form (requiring respondents to indicate they either consider a policy or paragraph to be 'sound' as written, or whether they consider some changes are required, and the policy or paragraph is therefore 'unsound') mean that, for our suggested amendments to policies to be regarded appropriately through the consultation process and subsequent examination of the AAP, we have needed to indicate that we consider a number of policies to be 'unsound'.

The IAMP has potential to have implications for Gateshead's economic growth, and this consultation is the first opportunity we have had to consider the Councils' draft policies for an AAP. As such it is perhaps unsurprising that we have recommended a number of revisions to the proposed policies which we consider could improve their effectiveness, particularly in relation to the potential impacts on Gateshead. However, we would like to make clear that, as noted in our previous responses to consultation on emerging proposals for the IAMP, Gateshead Council is supportive of this project, and we regard the overarching vision and broad policy approach to development at the IAMP to be appropriate. We consider that when taken as a whole, our suggested amendments to the draft IAMP AAP policies amount to relatively minor modifications which, if taken forward would improve the clarity of the Councils' emerging policy approach to development of an IAMP.

Strategic Policies

Policy S2 sets out the Councils' approach to designating Green Belt and safeguarded land. Criterion B states: "*Areas of safeguarded land shall only be released for development through a review of the AAP, where it can be demonstrated that there is insufficient land within the allocated employment areas to accommodate development needs.*" Although the criterion makes clear that a revision of the IAMP AAP is the only means by which safeguarded land can be released for development, neither the policy nor its supporting text give an indication of how the Councils will determine whether there is sufficient land within the allocated employment areas to accommodate development needs. The monitoring framework provided within Appendix B identifies a contingency measure for monitoring the implementation of this policy (and the trigger for a review of the IAMP AAP), stating: "*If 50% of the land is taken up by year 5, then consider an early review of the AAP to release the safeguarded land*". However, this approach does not appear to provide a clear mechanism for how the capacity of the IAMP will be reviewed after year five of the project's implementation.

The future release of safeguarded land (50ha) at the IAMP could have significant implications for economic development in the wider area, and for Gateshead's policy approach to the provision of employment land. In our view, the policy would benefit from increased clarity regarding which criteria need to be fulfilled before a review of the IAMP AAP would be deemed necessary. Inclusion of some criteria within policy S2 or its supporting text (rather than the current reference within the monitoring framework table) would also aid transparency. In our view, appropriate criteria would establish how future development needs at the IAMP will be determined, and set out how these needs will be considered against the remaining capacity of land within the IAMP.

Policy S2 and the approach to monitoring this policy appear to refer only to an exploration of the demand for, and supply of employment land within the allocated employment areas of the IAMP. Notwithstanding the specific sectors that will be the focus of development at the IAMP, in our view a more effective assessment of the need to release safeguarded land would consider the supply of suitable and deliverable employment land in other nearby locations, including those within Gateshead. Such an approach would be in keeping with the Duty to Cooperate, and would aid in minimising the potential displacement effects of the IAMP project. Considering the supply of employment land in nearby areas will be of particular relevance if development within the IAMP's allocated employment areas contains occupiers operating outside of the automotive and advanced manufacturing sectors.

Land Uses

Policy S3 aims to establish the principal uses that will be located within the IAMP. Supporting text to the policy notes that, in order to protect against potential future changes

to permitted development rights, the long term uses of the IAMP for the automotive and advanced manufacturing sectors will be secured through a requirement in the Development Consent Order (DCO). Providing a robust and unambiguous planning framework for the uses that are to be located within the IAMP is likely to be a key factor in its success as a strategically important employment location. Accordingly, we consider that policy S3 should more clearly specify the principal uses that will be considered appropriate within the IAMP. Implementing the IAMP vision will mean the development of the IAMP primarily for B2 and B8 uses, and these Principal Uses should be clearly defined within the AAP policy. Clearly identifying the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses “*as set out in policy S3*”.

Criterion B of policy S3 aims to establish criteria which will be used to assess where development proposals not associated with automotive or advanced manufacturing sectors will be acceptable. For proposals to be considered acceptable, criterion B.iii. requires applicants to demonstrate “*that there are no alternative, suitable locations*” that could accommodate the proposal. The AAP does not indicate the geographic area that should be used in the assessment of alternative, suitable locations. Given the IAMP’s close proximity to Gateshead, and a number of our employment areas, we consider the policy would be more effective if it is made clear that assessments of suitable, alternative locations should include an appraisal of potential development sites in Gateshead.

Policy S4 identifies the mix of uses (in terms of amount of floorspace) that will be accommodated within the IAMP. Although the policy sets the total amount of floorspace for employment (B use class) uses within the IAMP, the policy does not indicate floorspace area(s) of individual units. Supporting text to the policy notes: “*The IAMP AAP will facilitate provision for a range of unit sizes to encourage companies of varying scales to locate on the site. This approach offers the opportunity for business growth within the development to encourage future sustainability*”. We recognise the potential benefits of supporting the development of businesses located within the IAMP, and also acknowledge the need to accommodate a range of unit sizes within the IAMP to cater for the needs of different businesses. However, in our view, it would be appropriate for the majority of the IAMP’s premises to be larger units capable of attracting and accommodating larger occupiers. An approach of focussing on the provision of larger premises, capable of accommodating established businesses would be in keeping with the IAMP’s vision of establishing “*A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries*”, and would also support the objective of attracting “*European-scale ‘super suppliers’*”. Provision of a relatively high proportion of larger units would also support the use of the IAMP by businesses operating in the automotive and advanced manufacturing sectors, reinforcing the Councils’ approach of concentrating development within these specific sectors.

Policy S5 aims to establish the Councils’ approach to ancillary uses within the IAMP. Ancillary uses will provide an important supporting function within the IAMP; however, if left unchecked, there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, inappropriate development of retail and leisure uses within the IAMP could be detrimental to the project, and could detract from its contribution to economic growth. Accordingly, a clear and succinct policy is required to control the location and quantity of ancillary uses. We consider the current structure of policy S5 results in some ambiguity regarding the appropriate quantity and location of ancillary uses within the IAMP.

Criterion A of policy S5 sets out the type and quantity of ancillary uses that will be acceptable within the whole of the IAMP, and states: “*To support the delivery of a*

*sustainable scheme the following ancillary uses shall be permitted **within the IAMP** [our emphasis] as part of a comprehensive scheme comprised in the IAMP DCO application".* The criterion goes on to specify the total quantity of floorspace that will be permitted for some ancillary uses, including a total of 1,500sq m for retail and leisure uses.

Criterion B specifies that ancillary uses of education, training, leisure and hotel uses shall be accommodated within or next to the Hub. Although supporting text to policy S6 suggests that the Hub will be a key location for retail uses, restaurants and cafés, such uses are not mentioned within criterion B of policy S5.

Criterion D of policy S5 states: "*In addition to the Hub location, small scale retail and leisure provision of up to 1,000sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don*". Criterion D of this policy (unlike criterion A) does not make clear whether the amount of ancillary floorspace specified is the total quantity of floorspace that will be permitted, or the maximum area that will be acceptable for a single unit. Assuming that criterion D sets out the total retail and leisure floorspace that will be acceptable within the northern part of the IAMP, applying this alongside criterion A suggests that there will only be 500sq m of retail and leisure facilities within the Hub location, which does not seem appropriate for its status as the 'focal point' for ancillary facilities.

An unambiguous policy framework guiding the location and quantity of ancillary uses within the IAMP as a whole, and within the Hub location specifically would contribute to a more effective policy, and we respectfully suggest that revisions are made to improve the clarity of policy S5.

Design

Policy D1 provides key design principles that will be used to shape the IAMP. Given the sensitivity of the River Don to nearby development, we suggest that protection and enhancement of the River Don corridor should be a key design principle for the IAMP, set out within policy D1. Effective water management and provision of landscape and ecology buffers will support this principle, as would a requirement for the proposed bridge crossing to be sensitively designed to minimise its impact on the River Don corridor. A requirement to protect and enhance the River Don Corridor would also be consistent with the policy approach Gateshead Council has taken to development at the South of Follingsby Lane employment site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP).

Highway Infrastructure

Policy T1 relates to the mitigation of the highways impacts of the IAMP. The Councils have published a Transport Technical Background Report to support consultation on the publication draft AAP; however, this report does not provide detail on the transport modelling work that has been undertaken. Through ongoing dialogue, South Tyneside Council and Sunderland City Council have agreed to share this more detailed evidence on transport modelling with Gateshead Council. Once we have received and had the opportunity to review this evidence, we hope to be in a position to advise on whether we consider the approach to mitigating the IAMP's traffic impacts is appropriate, particularly regarding the potential impacts on Gateshead.

Walking, Cycling and Horse Riding

Policy T2 sets out the Council's emerging policy on non-motorised transport at the IAMP. If sustainable transport options are to be optimised within the IAMP, and within this part of the region, policies should seek to firmly integrate sustainable transport options within developments. The current approach within policy T2, particularly within criterion A.i. and

A.ii. places focus on accommodating cycleways and footpaths around planned changes to the highways network, rather than highlighting the importance of establishing a high-quality, integrated sustainable transport network. We would support changes to policy T2 which emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.

Public Transport

Policy T3 sets out the approach that will be taken to promote and facilitate public transport servicing the IAMP. We support the enhancement of bus services to and from the IAMP, and are keen to engage with both Councils to discuss potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.

Flood Risk and Drainage

Policy IN2 includes requirements to provide SuDS features within the IAMP. Criterion C requires that “...run-off from the site (post development) does not exceed corresponding greenfield rates, minimises pollution and is effectively managed with clear ownership in place”. While we support the principle of this policy, we consider that its requirements regarding pollution should be strengthened, by replacing “minimises” with “prevents”. The policy also presents an opportunity to support the multifunctional benefits of SuDS, and should require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy.

A further opportunity for the IAMP to compliment the development of the South of Follingsby Lane site could be realised if policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead. This approach would support the wider catchment management and ecological connectivity of the River Don.

Ecology

Policy EN2 seeks to establish policies which will protect and enhance the ecological value of the IAMP. As referred to in our comments relating to draft AAP policies D1 and IN2, the River Don corridor provides a valuable shared ecological resource which spans areas of Gateshead, South Tyneside and Sunderland. The mobile nature of protected species also means that development within the IAMP has potential implications for biodiversity within Gateshead. In this respect, Gateshead Council would support a strong policy approach to protecting and enhancing Local Wildlife sites and ecological connectivity through development of an IAMP. We recognise that policies of the AAP will be applied alongside those contained elsewhere in the Councils’ respective Local Plan documents. However, we would support revisions to the wording of policy EN2 to provide a more robust policy approach requiring the protection and enhancement of ecological assets through development of the IAMP.

Supporting text to policy EN2 states: “*Priority will be given to mitigating effects [on ecological assets] within the IAMP boundary, however in certain cases it may be necessary to provide offsite mitigation*”. In our view it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don corridor is to be protected, and this should be made clear within policy EN2.

Summary

If the potential benefits of an IAMP for Sunderland, South Tyneside, and the wider region are to be delivered, effective cooperation with key stakeholders will be of fundamental importance. Gateshead Council welcomes the opportunity to contribute to the IAMP's success through active participation in this process.

Yours Faithfully,



Neil Wilkinson

Spatial Planning and Environment
Development & Public Protection
Communities and Environment
Gateshead Council

Historic England

**International Advanced Manufacturing Park Area
Action Plan (IAMP AAP) Examination**

Statement of Common Ground

as agreed between

Sunderland City Council;

South Tyneside Council; and

Historic England

January 2017

Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council and South Tyneside Council (“the Councils”); and Historic England.
- 1.2 The Statement sets out the confirmed points of agreement between the Councils and Historic England with regard to the submitted International Advanced Manufacturing Park Area Action Plan (IAMP AAP) 2017-2032.

Background

- 2.1 The Councils have been working jointly to prepare the IAMP AAP which will establish the planning policy framework for the delivery of a new International Advanced Manufacturing Park on land to the north of the existing Nissan manufacturing plant.
- 2.2 In August 2016, the Council’s published the Publication draft of the IAMP AAP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.3 In response to this statutory consultation, Historic England submitted a formal response to the draft plan on 26 September 2016. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated that, as published, Historic England was not satisfied that the plan was sound or legally compliant for several reasons, as set out below:
 - There was no evidence that the plan had been informed by an up-to-date and robust historic environment evidence base, or that a proper assessment had been made of the likely impact of the different allocation options upon the significance of any heritage assets affected, in particular the Grade II Listed Hylton Grove Bridge which would be located within the centre of the site;
 - There was little protection offered to the heritage asset by the draft policies, with the exception of a passing reference in Policy D1; and
 - That the presence of the Grade II Listed Hylton Grove Bridge was not recognised on the Policies Map.
- 2.5 In order to address these concerns, the Councils have been working together with Historic England and have subsequently agreed several minor changes to the AAP and supporting evidence base; comprising of the Planning Policy Technical Background Report and Sustainability Appraisal –Post Publication Draft Consultation Addendum; to satisfy the concerns of Historic England.
- 2.6 Subject to these changes to the Planning Policy Technical Background Report and Sustainability Appraisal – Post Publication Draft Consultation Addendum, Historic England have agreed that

they wish to formally withdraw their objections as they now consider that the draft AAP incorporating the proposed modifications as submitted, is both sound and legally compliant.

Agreed matters

3.1 In agreement with Historic England, the Councils have proposed the following minor modifications to the AAP as submitted (new text shown in bold). Please note that the paragraphs below also reflect other changes proposed as a result of the consultation and therefore may address more than just Historic England's concerns:

2.5: The IAMP Site Masterplan Objectives

"The site currently mainly comprises of arable farmland. The River Don runs through the centre of the area. **The Grade II listed Hylton Grove Bridge runs over the River Don. The site was previously crossed by railway infrastructure which is no longer present on site and** existing development is limited to mainly agricultural buildings which are distributed across the site along the A1290, off Downhill Lane and Follingsby Lane. The North East **Land Sea and Aircraft** Museums is located in the southern part of the site next to the A1290 / Washington Road along with some residential properties. **There are also approximately 2.5ha of playing fields located adjacent to the museums."**

4.4.1 Masterplan Objectives

"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."

Policy D1: Masterplan Design


"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 Give consideration to the setting of listed buildings such as 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"

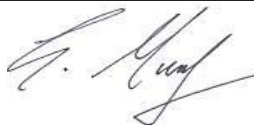
Appendix A: IAMP AAP Policies Map


Inclusion of Grade II Listed Hylton Grove Bridge as a feature on the Policies Map with reference to Policy D1.

3.2 In addition to the agreed changes to the IAMP AAP, the councils have also agreed changes to the supporting Planning Policy Technical Background Paper and have prepared a Sustainability Appraisal – Post Publication Draft Consultation Addendum. Historic England have agreed the text included within these supporting documents , which together with the proposed minor modifications to the AAP, address the concerns raised within their letter dated 26 September 2016.

Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		24 January 2017

Signed on behalf of South Tyneside Council		
Name and position	Signature	Date
George Mansbridge Head of Development Services		24 January 2017

Signed on behalf of Historic England		
Name and position	Signature	Date
Barbara Hooper Principal, Historic Places Team		23 January 2017

Appendix 1



Historic England

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

Our ref: PLo0034147
Your ref:
Telephone 0191 269 1237
Mobile 07775 003532
Date 26 September 2016

iamp@sunderland.gov.uk; 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 *'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 Penshaw 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.

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

A handwritten signature in black ink, appearing to read 'B Hooper', is positioned over a faint, repeating watermark of the word 'electronic'.

Barbara Hooper
Principal, Historic Places Team

Email: barbara.hooper@historicengland.org.uk



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; iamp@southtyneside.gov.uk](mailto:iamp@sunderland.gov.uk)

Dear Ms Harrison

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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.

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



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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




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Newcastle Council

**International Advanced Manufacturing Park Area
Action Plan (IAMP AAP) Examination**

Statement of Common Ground

as agreed between

Sunderland City Council;

South Tyneside Council; and

Newcastle City Council

January 2017

Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council, South Tyneside Council and Newcastle City Council.
- 1.2 The Statement sets out the confirmed points of agreement between the Councils with regard to the submitted International Advanced Manufacturing Park Area Action Plan (IAMP AAP) 2017-2032.

Background

- 2.1 Sunderland and South Tyneside Councils have been working jointly to prepare the IAMP AAP which will establish the planning policy framework for the delivery of a new International Advanced Manufacturing Park on land to the north of the existing Nissan manufacturing plant.
- 2.2 In August 2016, the Councils published the Publication draft of the IAMP AAP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.3 In response to this statutory consultation, Newcastle City Council submitted a formal response to the draft plan on 26 September 2016. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated that, as published, Newcastle City Council was not satisfied that the plan was sound or legally compliant for several reasons, as set out below:
 - Policy S3 did not make clear what the 'principal uses' are, and it was considered that the policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would compete with Gateshead and Newcastle's offer and the delivery of their adopted Core Strategy and Urban Core Policies (CSUCP);
 - Further clarity is required on what sectors the provision of the 24,000 sqm of employment floorspace for B1(a) and B1(b) set out in Policy S4 relate to, in terms of what size the units will be, and how this relates back and is ancillary to the objectives and purpose of the IAMP; and
 - Further clarity is needed in policies S5 and S6 on how it is planned to control the location and quantity of ancillary uses.
- 2.5 In order to address these concerns, the Councils have been working together and have subsequently agreed several minor changes to the AAP to satisfy the concerns of Newcastle City Council.
- 2.6 Subject to these changes, Newcastle City Council have agreed that they wish to formally withdraw their objections as they now consider that the revised AAP, as submitted, is both sound and legally compliant.

Agreed matters

3.1 In agreement with Newcastle City Council, Sunderland City Council and South Tyneside Council have made the following minor modifications to the AAP (new text shown in bold).

Policy S3: Principal Uses

- A. ~~Through the DCO application, Consent shall be granted for employment development, in the allocated employment areas on the policies map~~ **production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors. These are the Principal Uses for IAMP.**, ~~where the intended uses directly relate to the automotive and advanced manufacturing sectors for production, supply chain and distribution activities.~~
- B. **To ensure premises are retained for their original permitted use in the long term the DCO shall contain requirements to that effect or the Councils may consider making a direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 to that effect.**
- C. ~~Employment development proposals from other sectors for B2 uses and B8 uses shall only be acceptable where:~~
 - i. ~~demand for this other type of use to be located within the IAMP can be clearly demonstrated through market demand analysis; and~~
 - ii. ~~it can be demonstrated that this type of use is not detrimental to the operation or known needs of the principal uses and the objectives of the IAMP AAP or to the comprehensive development of the IAMP; and~~
- D. ~~it can be demonstrated there are no alternative, suitable locations~~
- E. ~~Development consent for B2 and B8 uses should be granted subject to DCO requirements to ensure premises are retained for the original permitted use in the long term.~~
- F. ~~C. Proposals for residential development and development outside of the parameters as set out within Policy S5, shall not be permitted.~~
- D. **Proposals for retail and leisure uses outside of the Hub as shown on the Policies Map shall not be permitted, with the exception of the modest scale ancillary uses in the Northern Employment Area (denoted by an 'N' on the Policies Map).**

4.3.1: Principal Uses

The long term use and sustainability of the strategic employment location for the automotive and advanced manufacturing sectors will be secured through a requirement in the DCO **and/ or a Town and Country Planning (General Permitted Development) Order Article 4 Direction, which can remove specific development rights related to change of use or permitted development or operational development.**

Policy S4: ~~Mix of uses~~ **Scale and Quantum of Principal and Supporting Employment Uses**

- A. Within the allocated employment areas shown on the IAMP AAP policies map, planning permission shall be granted for up to 260,000 sq m of employment space **for the Principal Uses as follows:** ~~where the mix of uses is:~~

- i. up to 24,000 sq m of employment space for B1(a) and B1(b) **class uses only** where this is **related to** ~~in support of~~ the Principal Uses, as set out in Policy S3; and
- ii. up to 236,000 sq m of employment space for B1(c), B2 and B8 **class uses**.

4.3.2: Mix of Uses

The primary **scale and quantum of mix of uses** set out in the policy originates from the 'Strategic Employment Study' (2013) and the schedule of employment and floorspace (2014) submitted as part of the City Deal. The scale and mix of uses is evidenced and justified within the Commercial and Employment Background Report.

Deletion of Policies S5 and S6 of the Publication draft and their replacement with one amalgamated Policy with supporting text, as set out below:

4.3.3: The Hub and Ancillary Uses

Policy S5: The Hub and Ancillary Uses

- A. To support the delivery of a sustainable scheme the following ancillary uses shall be permitted to form 'The Hub', in the location shown on the Policies Map as part of the comprehensive development of IAMP:
 - i. A hotel (Use Class C1) (up to 150 beds) with associated leisure and conference facilities;
 - ii. Education and training facilities (Use Class D2 (c)) to support the Principal Uses;
 - iii. Managed workspace for micro and start-up business (Use Class B1a) up to cumulative total of 3,000sqm gross floorspace), which is in addition to the total floorspace allowance set out for Principal Uses set out in Policy S4;
 - iv. Nursery and child-care facilities (up to cumulative total of 1,000sqm gross floorspace);
 - v. A range of small scale retail units (Use Class A1 and A3) up to cumulative total of 1,500sqm gross floorspace, with no single unit being greater in size than 250sqm gross; and
 - vi. A multi-modal transport interchange accommodating public transport, cycling and pedestrian access.
- B. The Hub should provide for higher density development compared to the surrounding employment uses in IAMP, to enable a concentration of permitted uses.
- C. The Hub shall be the primary location for ancillary uses. Provision for small scale retail provision (A1) up to a cumulative total of 1,000 sqm gross floorspace will be permitted within the Northern Employment Area, to support the Principal Uses, with no single unit being greater in size than 250sqm gross.

The vision for the IAMP is for 'a planned and sustainable employment location'. For this vision to be realised, the IAMP should include ancillary uses to provide an attractive working environment and meet the needs of a skilled workforce. Ancillary uses associated with retail, leisure and hotel facilities and space for education and training provision will be necessary to meet the vision and objectives for the IAMP.


Complementary ancillary uses are required within the IAMP AAP area to allow existing and new employees the opportunity to access facilities and services locally, making the development more

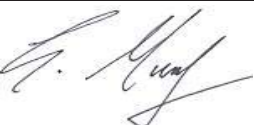
sustainable. These facilities may also be accessible and beneficial to employees in the adjacent Nissan complex and the residents of surrounding residential areas, but are primarily to serve the employment uses.

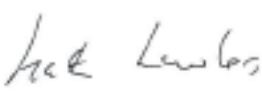
The Hub is located in the south of the AAP area, bordering the A1290 in order for existing employees at Nissan and related current supply chain to access the facilities and transport interchange easily and to also integrate an existing business, the Horseshoe Public House into the Hub offer.

This approach is in accordance with the NPPF, which emphasises the importance of sustainable development through the creation of 'a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being'. Therefore, it is important for the IAMP AAP to include provision to meet the needs of the business community at the IAMP and 'secure a good standard of amenity for all existing and future occupants of land and buildings'.

Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		24 January 2017

Signed on behalf of South Tyneside Council		
Name and position	Signature	Date
George Mansbridge Head of Development Services		24 January 2017

Signed on behalf of Newcastle City Council		
Name and position	Signature	Date
Kath Lawless Assistant Director of Planning		24 January 2017

Iain Fairlamb
Head of Planning & Regeneration
Commercial Development Directorate

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26 September 2016

Our reference: KL/EW/IF
Your reference:

If you need this information in another format or language please contact the sender.

Dear Iain

A New International Advanced Manufacturing Park for the North East

Thank you for consulting Newcastle on the proposed 'New Industrial Advanced Manufacturing Park for the North East'. We recognise the importance of cross boundary cooperation in the North East on strategic matters which can assist in the delivery of economic growth. A coordinated approach can assist development of regional transport, skills and attract inward investment to support employment.

The IAMP has potential to be of national significance in terms of its economic impact, and could play a major role in the development of the North East economy. In recognition of the potential wide-ranging implications of this project, and the requirement for local authorities to work together on cross-boundary issues under the duty to cooperate, Newcastle City Council wishes to submit a response to consultation on the publication draft IAMP AAP as this is a formal stage of the plan preparation process.

Notably, successful implementation of the IAMP project, through delivery of development which meets the vision and objectives for the IAMP, will make a positive contribution to economic growth in Sunderland and South Tyneside, and the wider North East region. Policies in the emerging IAMP AAP will be the primary means by which Sunderland and South Tyneside Councils can guide and support the successful and sustainable delivery of the IAMP.

The spatial strategy for the IAMP AAP, seeks to deliver a scheme comprising 260,000 sq m of floorspace for automotive and other advanced manufacturing, engineering and related distribution businesses. This would be delivered on a site of 100 hectares. Clearly, given the scale and location of the IAMP there is potential to have a significant impact on economic development within Gateshead and Newcastle, and the successful application of robust policies relating to the IAMP will make a positive contribution to economic growth within our area. Following a review of the publication draft AAP, we have identified a number of areas where we consider further clarification is required to enable the AAP to be more effective in its delivery of a sustainable development.

The strategic policies set a framework to ensure integration with the Nissan plant and the Enterprise Zone. The IAMP AAP sets out 20 policies in order to guide future development within the IAMP AAP area. Policies S1 - S6 are of particular interest to Newcastle City Council.

Policy S1 'Comprehensive Development' sets out the approach to enabling the development of the IAMP. Point B states that 'only the delivery of a single comprehensive scheme which meets the objective of the IAMP will be supported'. Policy S2 'Green Belt and Safeguarded Land' sets out the Council's approach to Green Belt release.

Policy S3 'Principal Uses' confirms that through (A) the DCO application consent shall be granted for employment development, in the allocated employment areas on the policies map, where the intended uses relate directly to the automotive and advanced manufacturing sectors for production, supply chain and distribution activities. (B) States that employment development proposals for other sectors for B2 uses and B8 uses shall be acceptable where criteria and a sequential approach are met. Providing a robust and unambiguous planning framework for the uses that are to be located within the IAMP is likely to be a key determinant in its success as a strategically important employment location. Our observations are that it is not clear what the 'principal uses' are, and it is considered that the policy should be tightened up to prevent the IAMP becoming a general business / industrial park which could compete with Gateshead and Newcastle's offer and the delivery of the CSUCP. The supporting text advises that 'the policy also seeks to maintain a degree of flexibility in the consenting of future uses for the IAMP'. Accordingly, clear identification of the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses "*as set out in policy S3*".

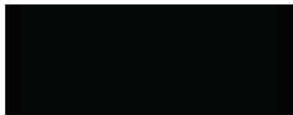
Policy S4 'Mix of Uses' advises that within the allocated employment area, planning permission will be granted for 24,000 sqm of employment floorspace for B1(a) and B1(b) where this is in support of the Principal Uses. As set out above, further clarity is required on what the principal uses are. In addition, planning permission will be granted for a further 236,000 sqm for B1(c), B2 and B.8. Further clarity is required on what sectors this provision is for, what size the units will be and how this relates back and is ancillary to the objectives and purpose of the IAMP.

Policy S5 'Ancillary Uses' sets out a wide but not exhaustive range of essentially service uses which will complement the IAMP. Policy S6 'The Hub' advises that permitted uses are set out in Policy 5, however as S5 is not exhaustive this is difficult to quantify and as such there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, development of retail and leisure uses within the IAMP could detract from its contribution to economic growth. Accordingly, further clarification is required on how it is planned to control the location and quantity of ancillary uses.

Overall the comprehensive development of the IAMP in general is supported subject to the above comments on the policy wording, and will contribute to the objectives of the Government's Northern Powerhouse agenda. In this context we would also like to understand what assumptions have been made about EU/devolution funding.

We understand that the current consultation is part of an ongoing process of discussion and evidence preparation, involving relevant public bodies and key stakeholders. Newcastle City Council welcomes the opportunity to contribute to the IAMP's success through active participation in this process.

Yours sincerely



Kath Lawless
Assistant Director Planning

Sport England

**International Advanced Manufacturing Park Area
Action Plan (IAMP AAP) Examination**

Statement of Common Ground

as agreed between

Sunderland City Council;

South Tyneside Council; and

Sport England

January 2017

Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council and South Tyneside Council (“the Councils”); and Sport England.
- 1.2 The Statement sets out the confirmed points of agreement between the Councils and Sport England with regard to the submitted International Advanced Manufacturing Park Area Action Plan (IAMP AAP) 2017-2032.

Background

- 2.1 The Councils have been working jointly to prepare the IAMP AAP which will establish the planning policy framework for the delivery of a new International Advanced Manufacturing Park on land to the north of the existing Nissan manufacturing plant.
- 2.2 In August 2016, the Councils published the Publication draft of the IAMP AAP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.3 In response to this statutory consultation, Sport England submitted a formal response to the draft plan on 22 September 2016. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated that, as published, Sport England objected to the plan for the following reasons:
 - Neither the policies map, nor the plan, acknowledges that the plan area includes a playing field site (located immediately north and east of the Aircraft Museum);
 - The AAP does not consider how development could proceed whilst satisfying paragraph 74 of the NPPF and Sport England’s playing field policy; and
 - The AAP should have had regard to the detail contained within Sunderland’s Playing Pitch Strategy 2015 in its preparation. If it is not proven that there is a surplus of playing pitches (across all sports and age-groups) in this part of Sunderland when the land comes forward for development then it will be necessary to replace the playing field in accordance with Sport England’s playing field exception E4 and NPPF para 74.
- 2.5 In order to address these concerns, the Councils have been working together with Sport England and have subsequently agreed several minor changes to the AAP and supporting evidence base to satisfy the concerns of Sport England.
- 2.6 Subject to these changes, Sport England have agreed that they wish to formally withdraw their objections as they now consider that the draft AAP incorporating the proposed modifications as submitted, is both sound and legally compliant.

Agreed matters

3.1 In agreement with Sport England, the Councils have proposed the following minor modifications to the AAP (new text shown in bold). Please note that the paragraphs below also reflect other changes proposed as a result of the consultation and therefore may address more than just Sport England's concerns:


2.5: The IAMP Site Masterplan Objectives


"The site currently mainly comprises of arable farmland. The River Don runs through the centre of the area. **The Grade II listed Hylton Grove Bridge runs over the River Don. The site was previously crossed by railway infrastructure which is no longer present on site and** existing development is limited to mainly agricultural buildings which are distributed across the site along the A1290, off Downhill Lane and Follingsby Lane. The North East ~~Land Sea and Aircraft~~ Museum is located in the southern part of the site next to the A1290 / Washington Road along with some residential properties. **There are also approximately 2.5ha of playing fields located adjacent to the museum.**"

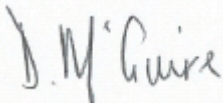
Policy S1: Comprehensive Development– Supporting text

"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 Aircraft~~ Sea 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."

Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		24/01/2017

Signed on behalf of South Tyneside Council		
Name and position	Signature	Date
George Mansbridge Head of Development Services		24/01/2017

Signed on behalf of Sport England		
Name and position	Signature	Date
Dave McGuire Planning Manager		16/01/2017

From: Dave McGuire [REDACTED]
Sent: 22 September 2016 11:43
To: Local Plan; IAMP SOUTH TYNESIDE
Subject: International Advanced Manufacturing Park Area Action Plan

Dear Sir / Madam

I refer to the above document and your recent consultation with Sport England. Thank you for seeking our views on this matter.

Sport England responded to the earlier consultation in February 2016 and our response is attached for your information.

We are dismayed to note that neither the policies map nor the plan acknowledges that the plan area includes a playing field site (located immediately north and east of the Aircraft Museum). I have attached an annotated aerial photo which shows the location, and area of the playing field.

Had the playing field's existence been acknowledged, then the AAP should then have gone on to consider how development could proceed whilst satisfying paragraph 74 of the NPPF and Sport England's playing field policy. Unfortunately the AAP ignores the playing field's existence and the policy implications thereof.

As such Sport England wishes to object to the AAP.

Sunderland's Playing Pitch Strategy 2015 is an adopted Council strategy to which the AAP should have had regard to its detail in its preparation. The PPS describes the number of pitches on the playing field and the teams that use them. The PPS also provides an indication as to the current and likely future adequacy of pitch capacity against demand across a range of sports / age groups.

If it is not proven that there is a surplus of playing pitches (across all sports and age-groups) in this part of Sunderland when the land comes forward for development then it will be necessary to replace the playing field in accordance with Sport England's playing field policy exception E4 and NPPF para 74.

Until the policies of the AAP are framed to recognise this constraint and are in line with the above requirement, then it will be necessary for Sport England to sustain its objection.

Sport England would be happy to discuss further with the Local Planning Authority as to how our objection could be resolved and I look forward to hearing from you on this basis.

regards
Dave McGuire
Planning Manager

[REDACTED]

Submission Appendix – February 2016 response

Dear Sir / Madam

I refer to the above, and your recent consultation with Sport England. Thank you for seeking our views on this matter.

The consultation material sets out 3 options for the geographical extent of the IAMP. In each instance the developable area includes land that is defined as playing field. The playing field lies immediately north of the Aircraft Museum and has an area of around 2.4 Ha.

Paragraph 74 of the NPPF, and Sport England's playing field policy operate on the basis that there is a presumption against development which leads to the loss of playing field unless;

- It is shown that there is an excess of playing pitch provision across pitch sports in the area, both now and into the foreseeable future; or
- The playing field is replaced (before development commences) by a playing field of equivalent or better quality in a suitable location

Sunderland's Playing Pitch Strategy has recently been adopted, but it does not show a surplus of playing pitches, and therefore as plans for the IAMP progress it will be important to work with Sport England to identify and deliver replacement playing field provision.

Should you wish to discuss our response further, then do not hesitate to contact me using the details below.

regards

Dave McGuire
Planning Manager



NE Aircraft Museum Playing Field

2.5Ha

Legend

- Feature 1
- Feature 2
- Nissan, Washington Road-Museum
- North East Aircraft Museum

