

**Sunderland  
City Council**



South Tyneside Council

**Meeting The Growth Needs of the International  
Advanced Manufacturing Park (IAMP)**

**Green Belt and Safeguarded Land Justification Report  
July 2024**

## Contents

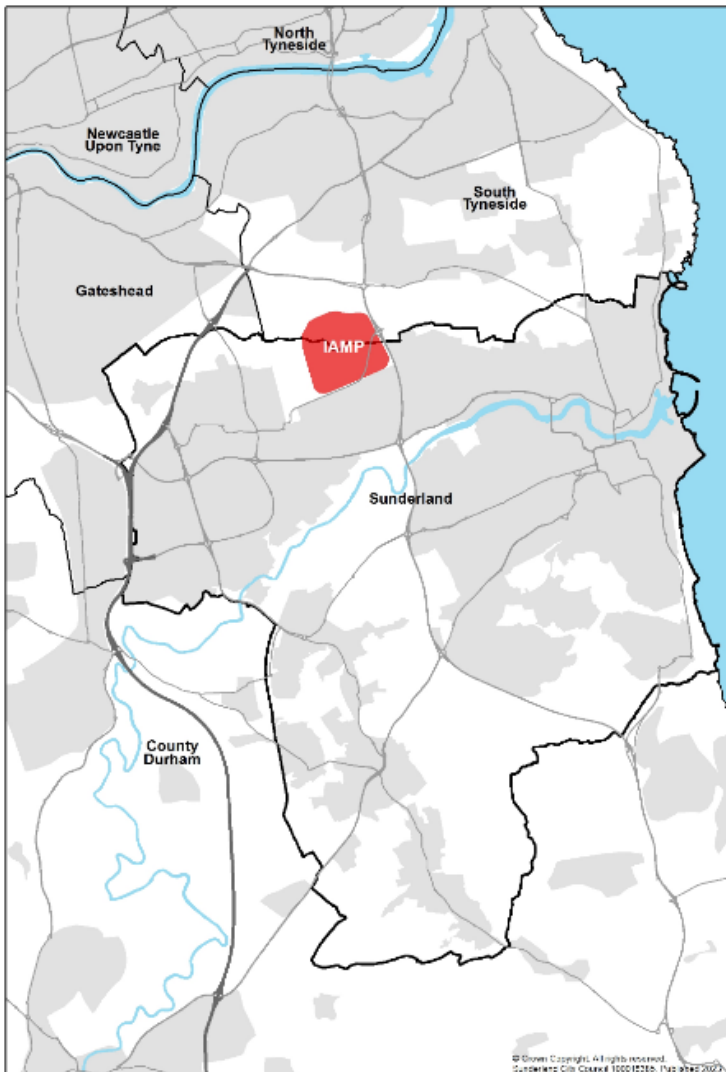
1. Introduction .....	3
2. The importance of the IAMP .....	5
3. The scale of the anticipated growth at the IAMP .....	6
4. The appropriateness of the Safeguarded Land in accommodating the IAMP growth .....	11
5. Release of IAMP AAP Green Belt land to meet IAMP growth .....	16
6. Assessing Green Belt harm .....	20
7. Conclusion .....	26

# 1. Introduction

## The International Advanced Manufacturing Park

- 1.1. The International Advanced Manufacturing Park (IAMP) is located near the Nissan Motor Manufacturing UK's (Nissan) Washington plant. The IAMP provides a bespoke, world class environment for the automotive supply chain, as well as the advanced manufacturing sector.
- 1.2. The overarching aim of the IAMP is to deliver 7,850 headcount jobs (on site) over the lifetime of the IAMP development. The IAMP began its journey as part of a City Deal published in 2014 and has been successful in bringing forward large-scale development, with development first commencing in 2018. Notwithstanding the success to date, opportunities brought about through the site's inclusion as part of the North East Investment Zone (IZ), changes brought about through the EU Trade & Cooperation Agreement and the emergence of technological change in the automotive and advanced manufacturing sectors, has necessitated a need to continue to develop an agile and flexible response to the future development of the IAMP. These changes have also made it necessary to consider the planning framework as development needs at the IAMP are evolving. The sections below add more context.

Map 1: General Location of the IAMP



## **The existing planning context for the IAMP**

- 1.3. The existing IAMP is located within the administrative areas of both Sunderland City Council (SCC) and South Tyneside Council (STC). Both Councils adopted the IAMP AAP in 2017 which sets the planning framework for the site against which planning applications are assessed and forms part of both local authorities statutory Development Plan.
- 1.4. Alongside the IAMP AAP, both Councils have a range of Development Plan documents which make up their respective Development Plans. Most pertinent for the changes associated with the draft (Regulation 18) IAMP AAP is the Sunderland Core Strategy and Development Plan (CSDP), which is explained in more detail in Section 2.

## **The evolving needs at the IAMP**

- 1.5. There have been a number of changes at the IAMP alongside technological and economic changes which have made it necessary to prepare a new IAMP AAP. This document forms part of the IAMP AAP evidence base and should be read alongside other documents, in particular the Employment Land Position Statement (2024) which justifies the need to expand the development area of the IAMP. The Employment Land Position Statement confirms the need for a total of 225 hectares of additional employment land for principal uses, thus a requirement for the allocation of an additional 75 hectares of development land.

## **Purpose and structure of this document**

- 1.6. The purpose of this document is to justify the allocation of additional employment land, which is currently identified partly as safeguarded land within the adopted Sunderland CSDP to meet longer term development needs and partly located within the Tyne and Wear Green Belt, adjacent to the existing International Advanced Manufacturing Park (IAMP) development areas. The document is made up of the following sections:
  - Section 2: outlines the importance of the IAMP.
  - Section 3: sets out evidence for the scale of future needs at the IAMP over the long term and outlines the land requirements for meeting IAMP growth needs. It establishes evidence that such needs are best located on part of the Sunderland Core Strategy and Development Plan Safeguarded Land and within a parcel of land within the Tyne and Wear Green Belt adjacent to the AESC UK gigafactory which is currently under construction.
  - Section 4: outlines the justification for utilising part of the safeguarded land for the evidenced future IAMP needs and establishes justification that exceptional circumstances exist for utilising part of the Tyne and Wear Green Belt for meeting the evidenced future IAMP needs.
  - Section 5: sets out a methodology for assessing Green Belt impacts.
  - Section 6: provides an assessment of the Green Belt parcel and establishes any Green Belt harm associated with release of the suggested site.
  - Section 7: outlines conclusions and next steps.

## **2. The importance of the IAMP**

### **Why is it important to make the IAMP a success**

- 2.1. The IAMP is at the centre of the region's automotive and advanced manufacturing growth. This has been illustrated by the success of the delivery on the site to date and the confirmation by Government, that land within and adjacent to the IAMP has been included within the North East Investment Zone, as outlined in the Spring Budget 2024. This means that the site has been identified for significant tax incentives and is recognised as an area of strategic investment potential. This is in recognition of the IAMPs ability to play a meaningful role in growing strategic industries such as battery production, and automotive and advanced manufacturing.

### **The significance of the Automotive and Advanced Manufacturing Sectors**

- 2.2. The success of the IAMP and the adjacent Nissan site is significant to the national economy. The Washington plant has been located in the area since 1985 and is a major local employer. The IAMP provides a bespoke, world class environment for the automotive supply chain, as well as the advanced manufacturing and distribution sectors – with the intention of contributing significantly to the long-term economic success of the North East and supporting the Government's levelling-up agenda.
- 2.3. The North East has an established automotive manufacturing cluster, the growth and competitiveness of which is promoted by the North East Automotive Alliance (NEAA). Data published by the NEAA provides a helpful insight into the composition of the cluster, with the regional automotive industry estimated to turnover £11 billion per annum and export vehicles worth £7.4 billion each year.
- 2.4. The latest industry profile published on the NEAA website states that the North East is home to five leading OEMs (Original Equipment Manufacturer) in the automotive industry including Nissan, Komatsu and Caterpillar. Taken together, the NEAA estimates that these OEMs produced almost 450,000 vehicles in 2018. The North East accounts for approximately 30% of all passenger vehicles produced in the UK and 20% of all battery electric vehicles produced in Europe.
- 2.5. The diversity of OEMs represented in the region is considered by the NEAA to be a key strength of the North East's offer. OEMs include: a volume car manufacturer (Nissan, the UK's most productive car plant); off-highway vehicle manufacturers; (the region is home to three of the UK's top five off-highway manufacturers); and engine manufacturers.
- 2.6. A large supply chain has developed to serve the region's OEMs (and other automotive manufacturers located beyond the North East). The NEAA estimates that there are more than 200 supply chain companies located in the area, including more than 30 Tier 1 suppliers, in excess of 200 Tier 2 to Tier 3+5 suppliers; a wealth of specialist SMEs (Small and Medium Sized Enterprise); and over 20 dedicated R&D (Research and Development) facilities. The regional supply chain includes a number of leading global brands such as Faltec, Gestamp, SNOP, Unipres and Envision AESC. In total there are 13,115 jobs in the North East serving the automotive industries, with the majority of these jobs located within Sunderland and South Tyneside (9,800 jobs across both authorities), most of which are located within or adjacent to the IAMP.

### 3. The scale of the anticipated growth at the IAMP

3.1. Alongside the cluster of high-quality jobs outlined in Section 2, the IAMP is considered the most significant regional asset to grow the automotive and advanced manufacturing sectors. There are a number of key drivers of future demand at the IAMP which includes the following:

- **Investment Zone** – The IAMP is included as part of the North East Investment Zone which focuses on advanced manufacturing and green industries and has been established to drive economic growth through clustering of investment zone sector businesses as part of a 10-year programme. Investment Zone status enables investment in infrastructure, skills, and innovation and enables new business investment operating within the designated tax site to access a range of tax reliefs. In addition, it enables re-investment of retained Business Rates growth, to facilitate further growth of the Investment Zone sectors.
- **Electrification** – The rapid move towards electrification within the automotive industry provides growth opportunities in the supply chains associated with the construction of these vehicles, taking into consideration the UK Zero Emission Vehicle (ZEV) mandate, for vehicle manufacturers to hit targets in relation to the percentage of their sales which are EVs, and the Government’s intention to cease the sale of Internal Combustion Engine (ICE) vehicles by 2035. Nissan have indicated that they intend to build 3 new electric vehicle models at their Washington plant as part of their overall ambition to manufacture electric only vehicles by 2030 and the IAMP, with land located in close proximity to Nissan’s Washington plant and AESC UK Gigafactory and the wider North East automotive cluster, is well placed to compete for such opportunities.
- **European Union Exit and Rules of Origin** – Since the UK’s withdrawal from the European Union the final Trade and Cooperation Agreement (TCA) was signed, this has changed opportunities related to the IAMP. Principally, this due to the Rules of Origin (RoO) which is a key component of the TCA. From 1st January 2021, UK car manufacturers have had to prove that a certain percentage of a component or finished product has been manufactured in either the UK or EU to qualify for zero tariffs. Given the UK’s commitment to phase out sales of petrol and diesel vehicles by 2035, the future of the UK automotive industry is inextricably linked with its ability to manufacture hybrid and electric vehicles. The shift in the industry towards electrification, and the need to comply with RoO means it is essential that the UK automotive industry develops a more localised electric vehicle supply chain. In particular, there is a need to focus on the development of battery production facilities. This is widely acknowledged as being critical to ensuring that tariff-free trade with the EU (the UK automotive industry’s largest export market) can continue.
- **Advanced Manufacturing and Distribution** – The appeal of the site to these sectors was identified through consultation with Invest North East England (INEE) as part of the preparation of the IAMP Employment Land Position Statement (2024). INEE outlined the belief that the IAMP is now seen as one of the “premier advanced manufacturing sites in the North East” with its appeal underpinned by the availability of good quality land, good accessibility to the strategic road network and a strong brand/good profile as an industrial location. It was also suggested that advanced manufacturers can already “see the value of being associated with the emerging cluster of activity at the IAMP” even if they are not active in the automotive sector.
- **Emerging Growth Sectors** – The Green Manufacturing and Clean Energy sectors are considered to be emerging growth sectors where there is a significant demand for new

development. It is anticipated that the IAMP is well placed to take advantage of these growth industries aligned to Advanced Manufacturing and Green Industries as key priority sectors nationally. This will also ensure full alignment between the AAP and the sectors identified through its Investment Zone status.

### **The deficit of employment land floorspace and need for additional employment land at the IAMP**

3.2. As outlined earlier, the Position Statement (2024) presents justification for additional land at the IAMP and has outlined an evolving business case associated with the IAMP. The basis of which is the need for additional land to allow IAMP to meet the 7,850 headcount jobs (which is a core objective of the IAMP).

3.3. Central to IAMP AAP justification is the evidence that employment densities are significantly higher than what was predicated in the evidence base examined for the existing IAMP AAP (2017). Work associated with the existing IAMP AAP, envisioned an employment density of 50 square metres per headcount job. However, when exploring achieved and pipeline development, it is clear that the employment densities being delivered and forecast on the site are significantly above this figure. The Position Statement (2024) identifies an average employment density of 77 square metres per headcount job, which equates to some 50% above what was envisaged in relation to the original IAMP AAP. When live enquiries received are factored in, the average employment density increases to approximately 88 square metres per headcount job. Moreover, some of the most significant activity at the IAMP, such as the new Gigafactory, will operate at an employment density double what was originally envisioned when the existing IAMP AAP<sup>1</sup> was developed. It is therefore clear that in order to support the levels of employment growth expected within the IAMP and maximise the opportunities presented through its inclusion within the North East Investment Zone, there is a need to allocate additional employment land to meet identified needs.

3.4. In relation to the above, it can be deduced that operations at the IAMP are delivering employment densities which are significantly higher than those currently planned through the existing IAMP AAP. This is illustrated in Table 1 below. It should be noted that the level of growth required would be in addition to a live planning application which is currently being considered by Sunderland City Council for a future gigafactory expansion which is shown in row E.

Table 1: Requirement at IAMP – Floorspace Requirements

A	Forecast Jobs	7,850 Headcount Jobs	
B	Employment Density	77 SQ M Per Job	88 SQ M Per Job
C	Total Floorspace Needed (a * b)	604,450 SQ M	690,800 SQ M
D	Space Delivered /Consented	333,496 SQ M	
E	Pending Planning Application	178,615 SQ M	
F	Total Floorspace Pipeline (d + e)	512,111 SQ M	
G	Residual Floorspace Need (c – f)	92,339 SQ M	178,689 SQ M

<sup>1</sup> This information is outlined in Section 6 of the Position Statement (2024).

H	Potential Floorspace at Town End Farm	54,600 SQ M	
		90,000 SQ M	
I	Resulting Floorspace Need	37,739 SQ M	124,089 SQ M
		2,339 SQ M	88,689 SQ M

3.5. In converting the residual floorspace need identified in Table 1 above into a land requirement, the Position Statement (2024) utilised an appropriate plot ratio. The existing IAMP AAP is underpinned by a plot ratio of 0.26. The plot ratios that have been achieved on-site to date are broadly in alignment with this figure. The Position Statement (2024) has converted the floorspace needs outlined in the table above into a land requirement.

3.6. Table 2 below outlines the land necessary to meet these additional land requirements by applying two alternative plot ratios to the residual floorspace need. This outlines a requirement of between 0.9 hectares and 47.7 hectares of land.

Table 2: Additional Land Requirements at the IAMP

	Plot Ratio	
	0.26	0.29
2,339 SQ M	0.9 Ha	0.8 Ha
37,739 SQ M	14.5 Ha	13.0 Ha
88,689 SQ M	34.1 Ha	30.6 Ha
124,089 SQ M	47.7 Ha	42.8 Ha

3.7. Given the possible level of investment at the IAMP, taking into consideration the incentives brought about through the recent inclusion of the site within the North East Investment Zone, the Councils consider that meeting needs associated with the high end of the requirements (47.7Ha) would be appropriate to ensure that sufficient land is allocated to maximise economic growth opportunities.

**The most appropriate land – the IAMP**

3.8. The Position Statement (2024) has outlined an analysis of where additional growth at the IAMP could be located. The proximity of IAMP to Nissan is identified as a fundamental factor in consideration of identifying appropriate land. The Position Statement (2024) explored sites close to Nissan, at locations such as Washington, Follingsby, Monkton and Boldon. Additionally, the Employment Land Reviews (ELRs) for Gateshead, Sunderland and South Tyneside were reviewed to understand more broadly the supply of available land. A minimum site threshold of 30ha hectares applied, given the land requirements identified earlier.



3.9. In relation to the above, no employment sites of 30 hectares or more were recommended for retention/ allocation in Washington, Follingsby, Monkton, Boldon area, other than the land that which remains available at the IAMP and an area of safeguarded land within Sunderland adjacent to the IAMP site. Moreover, the aforementioned ELRs outlined limited implied supply at Follingsby, Boldon/ Cleadon, Monkton/ Wardley and Washington. Given the lack of available supply within these areas, the Position Statement (2024) outlines the possible option for development on the Safeguarded Land at Washington and Green Belt land adjacent to the existing IAMP development areas as providing the most appropriate locations for the expansion of the IAMP.

3.10. Given the constraints outlined above, and in order to test whether the Safeguarded Land is the most appropriate site to meet identified development needs, the Position Statement (2024) considers the identification of potential suitable sites further afield. In relation to this exercise and with the exception of the IAMP site itself (and the adjacent safeguarded land as discussed above), this exercise highlighted the following sites:

- South of Bowburn Road, TurSDale, County Durham (EMP5): 44.3ha (with a further 62.0ha safeguarded beyond the Plan period);
- NETPark, County Durham (EMP150): 13.5ha (with a further 17.7ha safeguarded beyond the Plan period);
- Forrest Park, County Durham (EMP154): 50.9ha; and
- Tyne Marshalling Yards, Gateshead (G190): 34.8ha.

3.11. No sites of 30ha or more were identified within the local authorities of Sunderland and South Tyneside (with the exception of land already allocated for development within the IAMP). The suitability of these sites as well as safeguarded land adjacent to the IAMP – is summarised in Table 3 below (which is taken from the Position Statement (2024) and reproduced here). More comprehensive details are set out within the Position Statement (2024).

Table 3: Assessment of Potential Employment Sites

	South of Bowburn Road, TurSDale	NET Park	Forrest Park	Tyne Marshalling Yards	Safeguarded Land
Proximity to Nissan	17.3 Miles	22.0 Miles	28.5 Miles	7.8 Miles	<1.0 Mile
	26 Mins Drive Time	34 Mins Drive Time	36 Mins Drive Time	18 Mins Drive Time	5 Mins Drive Time
Proximity to Port	16.6 Miles	21.7 Miles	23.4 Miles	10.4 Miles	5.0 Miles
Proximity to Airport	18.4 Miles	13.0 Miles	11.1 Miles	12.4 Miles	15.2 Miles
Access to Labour	4	4	4	N/A	N/A
Strategic Road Access	5	4	5	N/A	5

Barriers to Development	Western parcel requires crossing over Leamside line	None	None	N/A	N/A
Compatibility of Surrounding Uses	Industrial/ Distribution	Light industry/ R&D	Industrial / Distribution	N/A	5

3.12. Given the above, the Position Statement (2024) confirms the specific qualities of the Safeguarded Land and a parcel of land within the Tyne and Wear Green Belt adjacent to the existing AAP development area as the most appropriate land to meet the needs associated with the IAMP. Both form part of the North East Investment Zone and would support the continued development of an automotive cluster. This enables investment in infrastructure skills and innovation and enables new business investment operating within the designated tax site to access a range of tax reliefs. This adds an additional advantage of the sites, from a viability and operational perspective relative to the other large sites outlined in Table 3 above. As outlined in previous evidence base documents, proximity to Nissan is a key criterion in identifying sites to attract automotive occupiers. The importance of this has crystallised in recent years, with trends such as the shift to electrification and greater customisation – as well as exogenous factors such as the need to comply with the Rules of Origin clause – creating further demand from the industry for localised supply chains, as outlined in more detail within the Position Statement.

3.13. The proposed extension sites fall wholly within the local authority boundary of Sunderland City Council. There are no identified Green Belt amendments proposed within the administrative boundary of South Tyneside Council.

3.14. This document has now outlined the need requirement to make the IAMP a success, it has established that the Core Strategy Safeguarded Land and a parcel of the Tyne and Wear Green Belt are the most appropriate locational requirements from an operational perspective. The next sections of this report will seek to explore if the two parcels of land are justified from a planning perspective. The document will first look to justify the safeguarded land as a possible location for growth and then look at the site currently located within the IAMP Green Belt.

## 4. The appropriateness of the Safeguarded Land in accommodating the IAMP growth

4.1. The Sunderland CSDP was adopted in January 2020. The CSDP is the main Development Plan Document for Sunderland City Council, which forms the statutory Sunderland Development Plan alongside the IAMP AAP, and saved policies contained in the Unitary Development Plan (UDP) and UDP Alteration 2<sup>2</sup>. Through the adoption of the CSDP, the safeguarded land was removed from the Tyne and Wear Green Belt and formally designated as Safeguarded Land through CSDP Policy SS3, with the purpose of meeting future development needs. The planning policy text is provided on page 45 of the CSDP<sup>3</sup> and is outlined below:

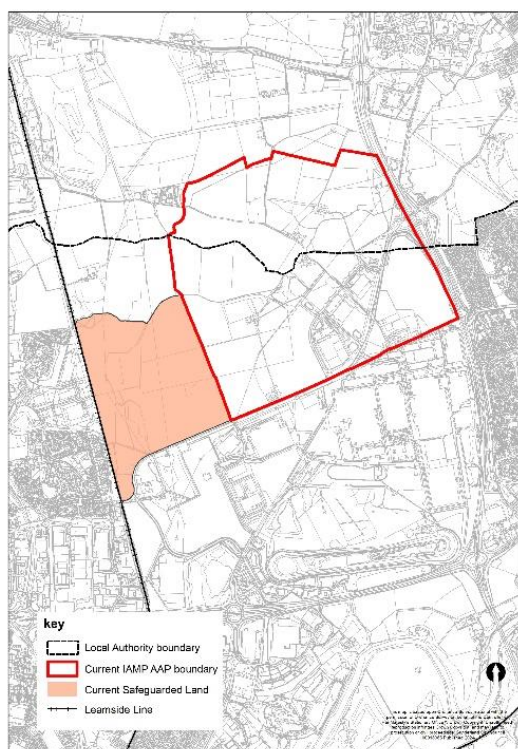
### **Core Strategy and Development Plan: Policy SS3: Safeguarded Land**

Land East of Washington has been removed from the Green Belt and designated as Safeguarded Land. Planning permission for the development of Safeguarded Land will not be granted except where development is temporary or would otherwise not prejudice the ability of the site to be developed in longer term

### **The location of the Safeguarded Land and context**

4.2. The existing IAMP AAP redline boundary is located adjacent to the Safeguarded Land. The location of the Safeguarded Land in context to the IAMP is set out Map 2.

Map 2: Safeguarded Land and the IAMP



<sup>2</sup> South Tyneside Council has its own distinct Development Plan. This has not been outlined here given that this section of the document relates solely to the release of part of the safeguarded land which falls entirely within the administrative area of Sunderland City Council.

<sup>3</sup> [Sunderland Core Strategy and Development Plan](#)

4.3. The Safeguarded Land is currently undeveloped and is predominately utilised as agricultural land.

4.4. As is outlined in map 2, to the west of the safeguarded land is the Leamside Line which is a safeguarded railway realignment. The Councils are working with partners to reintroduce passenger rail services onto this line and business case is currently being drafted regarding the introduction of Metro services onto the route. Consequently, any future reestablishment of the line could offer public transport solutions to a larger IAMP, and the safeguarded land would bring the site closer to this rail alignment. There are no sensitive land uses within the immediate surrounds of the site, with most residential areas located some distance away on the opposite side of the Leamside Line. The Leamside Line therefore forms a defensive barrier separating the safeguarded land from the residential areas to the west of the site. To the east of the site is the existing IAMP AAP area and the site is bounded by industrial development to the south.

#### **Is the Safeguarded Land appropriate for principal employment uses**

4.5. The Position Statement (2024) has set out evidence which clearly indicates that the Safeguarded Land is appropriate for to meet the anticipated land requirements identified. It has outlined the limited supply of sites in the North East to meet the anticipated growth required.

4.6. Given the location of the existing IAMP adjacent to the Safeguarded Land, it is considered that the site could form a natural extension the existing site. The site is located on the north eastern edge of Washington close to Nissan and the emerging Gigafactory and therefore benefits from many of the locational requirements which the principal sectors require, including close proximity to the strategic road network.

4.7. In recognition of the locational benefits of the site, the area of land identified for allocation through the AAP has been included as a tax site within the recently announced North East Investment Zone. Allocation of this site as development land will therefore allow these tax benefits to be realised by businesses locating here.

#### **Are alternative uses more appropriate**

4.8. Paragraph 4.53 of the CSDP indicates that the Land East of Washington (the Safeguarded Land) could accommodate a new sustainable community in the longer term but would require a comprehensive approach to ensure that the infrastructure required to make the site sustainable is delivered. It also indicates that Sunderland City Council would give consideration as to whether an early release of the safeguarded land is justified through the emerging A&D Plan. Notwithstanding the above, Sunderland City Council confirmed, through a Cabinet decision in September 2023, that it was no longer considered appropriate to continue the preparation of the A&D Plan and that it was considered to be a more effective use of available resources to consider future options for plan preparation on a more integrated basis through the forthcoming CSDP Review. The Cabinet decision did however indicate that given the cross boundary nature of the IAMP, that the policy framework for the development of the IAMP site should continue to be informed by a joint AAP.

4.9. Whilst the supporting text within the CSDP indicated that the site could potentially accommodate a new sustainable community in the longer term, it was safeguarded to meet

future development needs generally, not solely to be considered as a future residential allocation. This is clear, given that the monitoring indicators for the policy cover a range of uses including residential, employment and retail. Both the National Planning Policy Framework and CSDP allocation make clear that any release of the safeguarded land for development should be plan-led and evidence based.

4.10. With specific regard to the use of the site for residential use, Sunderland City Council has consistently confirmed its Five-Year Land Supply position with the Planning Inspectorate via the Annual Position Statement (APS) process on annual basis since the plan was adopted. The current APS confirms the five-year land supply position to 31 October 2024 and recent updates to the NPPF no longer require the Council to identify and update annually a supply of specific, deliverable sites until the CSDP reaches its fifth anniversary in January 2025. In addition, the Council have consistently met and exceeded the requirements of the Housing Delivery Test, with the latest results published in December 2023 showing delivery at 172% of the requirement. On this basis, the Council can demonstrate both strong housing delivery and future housing land supply, which does not justify the land being required for residential use at this point in time.

4.11. There are no other alternative uses (beyond those described in the paragraph above) where unmet needs have been identified, which would warrant further consideration.

#### **The appropriateness of the incorporation of part of the Safeguarded Land via the IAMP AAP**

4.12. CSDP background text (paragraph 4.52) sets out that, through a plan review, the reassessment of Safeguarded Land will involve the determination as to whether there are prevailing circumstances for releasing some or all the land for development or whether it should be maintained as safeguarded land.

4.13. In relation to the above, the IAMP AAP forms part of the statutory development plan for Sunderland City Council and represents an appropriate basis for a plan review with regard to the allocation of the Safeguarded Land.

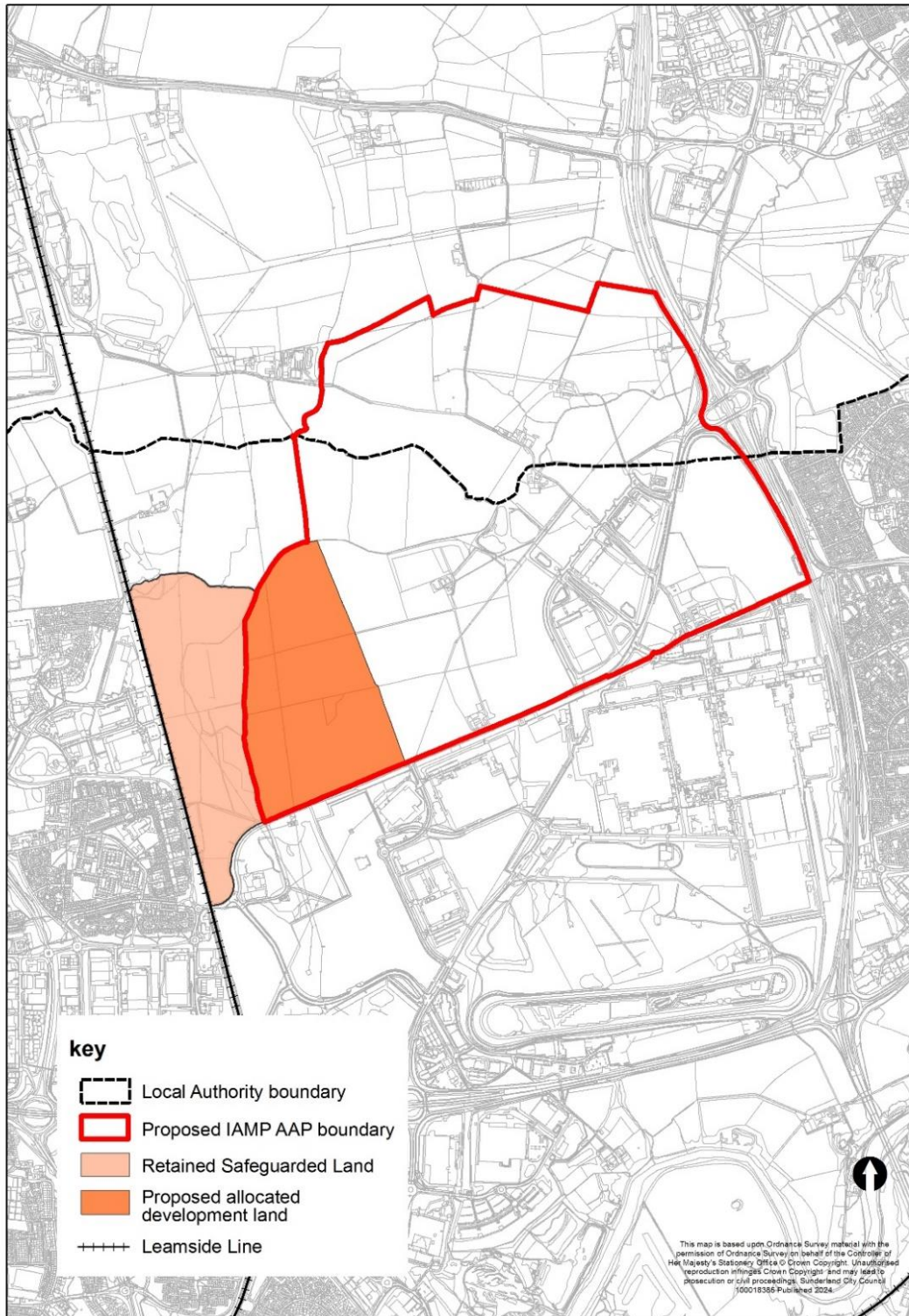
#### **How much of the Safeguarded Land is needed**

4.14. This report has justified the appropriateness of the safeguarded land in meeting the needs outlined in the Position Statement (2024). However, based on the evidence set out within the Position Statement, only a maximum of 47.7 hectares are needed to be released from safeguarded land to meet identified development needs. Officers at SCC consider that in choosing which part of the Safeguarded Land should be chosen to host the need requirement outlined in the Position Statement (2024), the following considerations were of importance:

4.15. Alignment with North East Investment Zone – the site identified is designated as part the International Advanced Manufacturing Strategic Site (IAMSS) which forms part of the North East Investment Zone and therefore has the benefit of incentives to maximise economic growth. These benefits would not apply to the western part of the safeguarded land which is not included within the designated IAMSS boundary.

- 4.16. Proximity to the IAMP – the IAMP is located adjacent to the eastern boundary of the safeguarded land and thus utilising the land within the eastern aspect of the site is more appropriate to ensure connectivity with the existing site.
- 4.17. Proximity to Nissan – Nissan is located to the east of the safeguarded land. Nissan is at the centre of the regions automotive economic cluster and consequently, proximity and orientation to Nissan is likely to be important. Therefore, the eastern aspect of the site is likely to add more value for principal employment purposes.
- 4.18. Proximity to the strategic road network – The eastern part of the site is located closer to the strategic road network than the western part. Consequently, this part of the site is considered to be more beneficial in terms of connections to the wider road network.
- 4.19. Distance from residential properties – the eastern part of the site is further from existing residential properties and thus offers advantages in terms of maintaining an appropriate distance to these sensitive receptors and will reduce any potential amenity impacts.
- 4.20. In taking into account the bullet points above, the Councils consider the eastern part of the Safeguarded Land the most appropriate land to be allocated for employment use within the emerging IAMP AAP.
- 4.21. In relation with the above, the Council propose to allocate the site outlined in Map 3 for principal uses within the draft IAMP AAP.

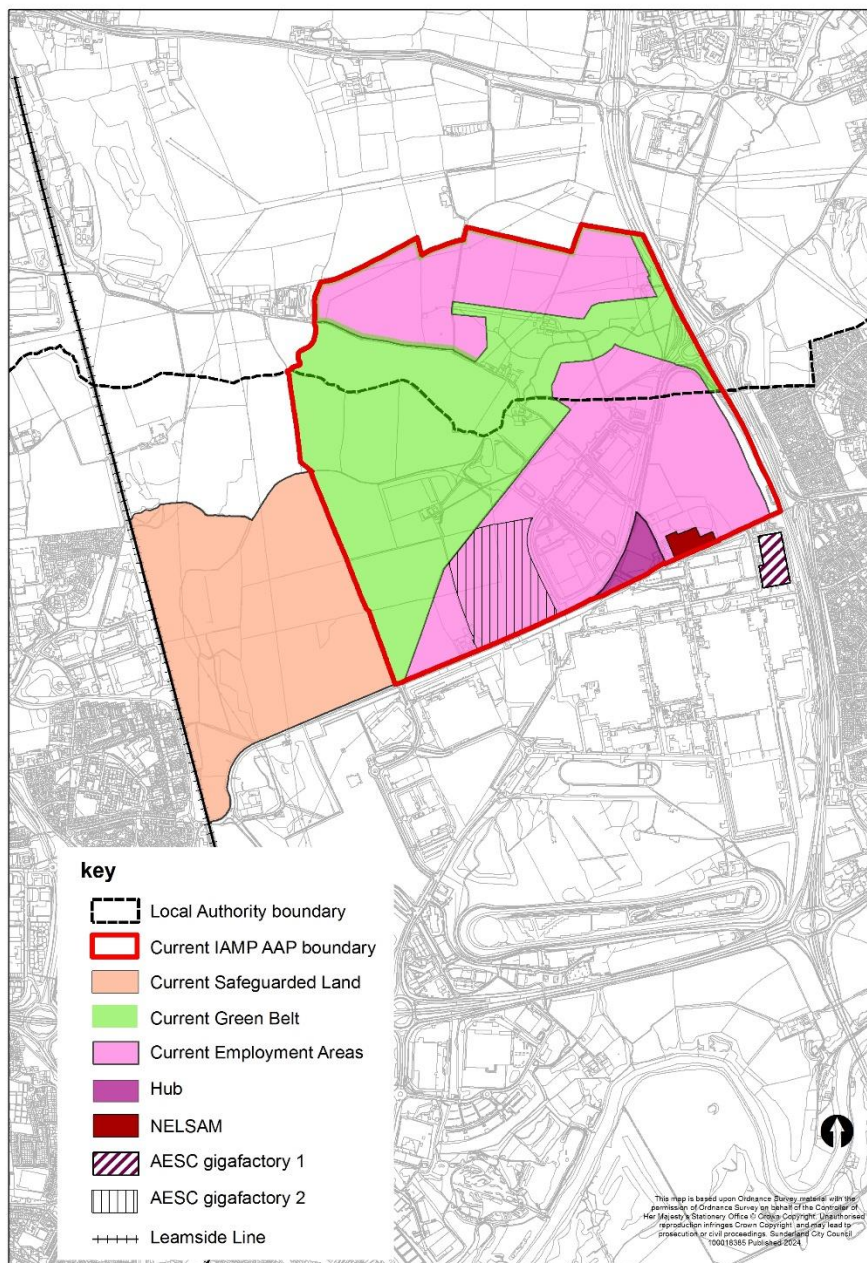
Map 3: Safeguarded land considered most appropriate for development



## 5. Release of IAMP AAP Green Belt land to meet IAMP growth

5.1. In 2021, Sunderland City Council granted planning permission for a Gigafactory (21/01764/HE4), which forms part of the wider phase 1 development works at the IAMP. Works are well advanced on the site, and it is anticipated that the gigafactory will become operational later in 2024. On completion, it will become only the second operational gigafactory in the UK (with the first being the existing smaller gigafactory located adjacent to the Nissan manufacturing site), with a capability of producing 12Gwh of batteries per annum. The location of the AESC Gigafactory Plant 2 is at the western edge of the development land allocated by the existing AAP, adjacent to a wedge of the Tyne and Wear Green Belt, which currently separates allocated development land within the IAMP and the safeguarded land, as outlined in Map 4 below.

Map 4: Location of AESC Plant 1 and AESC Plant 2 Gigafactory in Relation to Green Belt





- 5.2. In November 2023, Nissan and its partners announced proposals to build three new electric car models at its plant. At this time, the announcement made clear that there would need to be an additional (third plant) gigafactory developed. For context, the first plant relates to a location adjacent to the Nissan estate (south of Washington Road). This is the only currently operational gigafactory in the UK. Phase 2 is currently under development within the IAMP site (21/01764/HE4).
- 5.3. As set out within the Position Statement (2024), due to operation requirements, it is considered necessary for the new gigafactory to be located in close proximity to the existing facility currently under construction. This is due to there being a need to establish shared facilities with the existing facility. It is therefore critical to the ongoing success of the Nissan plant and its associated supply chain across the North East, for sufficient land to be identified to meet the needs of the additional required gigafactory.

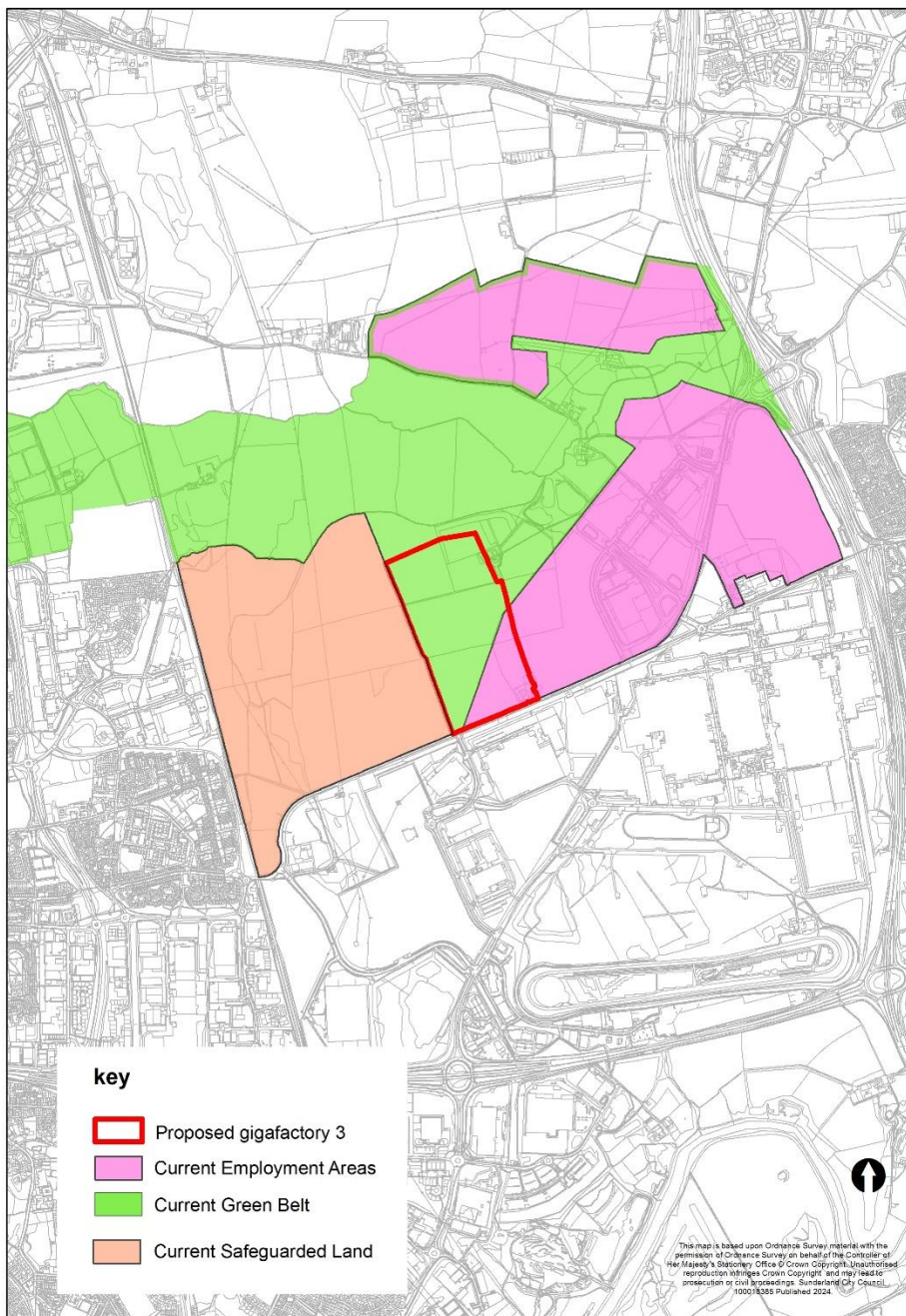
### **Locational Requirements**

- 5.4. A site must be chosen close to the existing gigafactory, and consequently, the Councils consider that the site outlined in Map 5 is the most appropriate site to host a new gigafactory. The Councils have considered the need for a site with the following significant factors in mind:
- Economies of Scale - Siting the plants together means that the gigafactory operator can be more competitive, with economics of scale and sharing facilities helping to reduce the unit cost of production, which is a key factor in manufacturing competitiveness and the price of the finished product.
  - Clustering – In connection to the point outlined above, clustering will likely allow additional productivity and agglomeration benefits relative to if the plant is located some distance from the end user and the aforementioned plants 1 and 2. It is also considered the development of a gigafactory on the site suggested in Map 5 would help strengthen the battery production cluster in this location.
  - Shared Facilities and Global Competition – There is a need to compete against other worldwide battery production clusters. The site outlined in Map 5 is considered beneficial given the synergies that can be created within the existing gigafactory. The gigafactories have been designed as a comprehensive development and need to be located next to each other. This link will mean that shared logistics, processes, facilities and staff can operate more competitively. This clustering together will create competitive advantages that will deliver productivity benefits. The need for shared facilities has been confirmed by a recent report (Batteries for Electric Vehicles (2023)). This outlines the importance of the efficiencies gained from building gigafactories and assembly plants near each other. Co-locating gigafactories with assembly plants is a common business model across Europe.
  - Infrastructure - A significant amount of investment has and is taking place to deliver infrastructure which can serve a future gigafactory phase at the location outlined. This includes highway improvements at A19/A1290 Downhill Lane junction. In addition, improvements at the A19/ A184 Testo's junction into the wider North East. Furthermore, the Councils (via their delivery partner IAMP LLP) has commenced work on the dualling of the A1290 which will be the main access for the gigafactory. Furthermore, other infrastructure can be shared with the existing gigafactory and

the IAMP more generally, such as, the energy Microgrid at the IAMP. This will support the high energy needs associated with the gigafactory and the rest of the site. Moreover, a direct connection to the National Grid transmission network has been secured with the potential to provide 255MW of power from 2025/26 subject to the construction of sub-station and connecting infrastructure and a private sector funder/operator has been secured to deliver and manage the Microgrid. This provides further attraction for the suggested site outlined in Map 5.

5.5. Given the above, the Councils consider the site outlined in Map 5 as the most appropriate for a further gigafactory expansion.

Map 5: The Suggested Location for the Next Phase of Gigafactory



### **AESC Phase 3 Planning Application**

5.6. In April 2024, AESC UK submitted a planning application (24/00723/FU4) which corresponds with the proposed site outlined above.

5.7. The application relates to a third AESC plant. The planning application currently under consideration is for the following proposals:

*Erection of a building to be used for the manufacture of batteries for electric vehicles, an assembly & warehousing building, an office building, sub-stations, gatehouse, ancillary compounds / structures and associated infrastructure provision, access, parking, drainage, landscaping and engineering operations, with temporary site compounds and parking associated with construction of the development.*

### **Reasonable Alternatives**

5.8. The gigafactory plants have been designed as a comprehensive development and need to be located next to each other as they are interlinked and with shared logistics, autonomous processes, facilities and staff. Clustering the two gigafactories together provides AESC with a competitive advantage and will enable it to improve productivity. Separating AESC's cluster of buildings would not work from a logistical point of view, would increase costs and reduce competitiveness.

5.9. In relation to the issues outlined in the paragraph above, it is clear that a further gigafactory needs to be located in close proximity to AESC Plants 1 and 2. Consequently, it is not considered there are other reasonable alternatives.

## 6. Assessing Green Belt harm

- 6.1. Although Section 5 has outlined a case for the location of the next phase of the gigafactory. As part of this site is designated as Green Belt, it is necessary to consider the potential impact of the release of the site (outlined in Maps 5 and 6) against the five purposes of Green Belt set out in national planning policy.

### Establishing an appropriate methodology

- 6.2. In order to appropriately assess if the site can be released from the Green Belt, an appropriate methodology is required. This subsection outlines an appropriate methodology to test the site against the five purposes of Green Belt and to establish if the proposals would result in harm the Green Belt.
- 6.3. There is no set methodology in national planning policy or planning practice guidance to guide local planning authorities on how to undertake Green Belt reviews. However, such assessments have principally been undertaken through a desktop study utilising mapping, aerial views, photography and where appropriate site visits. Moreover, a general understanding of the spatial relationship between settlements, countryside/ agricultural land and specific planning judgements is generally utilised.

### Identifying Green Belt Parcels

- 6.4. In most Green Belt assessments, it is convention to establish Green Belt parcels in order to see land in more granular detail. A parcel-by-parcel analysis is then usually undertaken. Given the site in question is relatively small, the Councils consider it appropriate to recognise the site as one parcel (referred to as parcel 1).
- 6.5. As part of this assessment, an exploration of previous Green Belt Assessments for the IAMP has been explored. In considering these assessments, the following four levels of impact has been utilised against the Green Belt purposes outlined in the National Planning Policy Framework:

Very High

High

Moderate

Low/No

- 6.6. In defining these impact levels (outlined above) and in alignment with other recent Green Belt Assessments, such as the South Tyneside Green Belt Study (2023), no absolute definitions associated with these levels of Green Belt harm are set. The levels provide a means of comparison and although it is prudent to minimise harm levels, where/if the assessment outlines a Very High level of Green Belt harm, taking all other factors into consideration, this may still be considered the most sustainable and suitable option for allocation.

### Level of detail

6.7. Given the nature of the IAMP and as outlined above, it is considered that only an analysis of one parcel of land is required, as shown in Map 6 below.

### Excluded areas

6.8. Green Belt assessment methodologies identify land-use designations which are filtered out of the assessment. These areas are considered to be the following 'absolute constraints' to development:

- Special Areas of Conservation (SACs),
- Special Protection Areas (SPAs),
- RAMSAR sites,
- Sites of Specific Scientific Interest (SSSI),
- Flood Risk Zone 3,
- Scheduled Monuments,
- Registered Parks and Gardens,
- Cemeteries,
- Reservoirs.

6.9. It has been confirmed that the parcel which will be assessed does not include any of these excluded areas.

### Assessment factors informing Green Belt harm

6.10. In assisting the analysis to the extent of any harm to the Green Belt, four key factors are utilised. These are outlined in Table 4 below.

Table 4: Four Factors Outlining Green Belt Harm

Green Belt Openness	Green Belt Function
Relationship Between Urban Areas and Land	Impact on Adjacent Green Belt

### Green Belt purposes

6.11. The NPPF (2024) establishes the following purposes for the Green Belt which are outlined in Table 5 below.

Table 5: Green Belt purposes

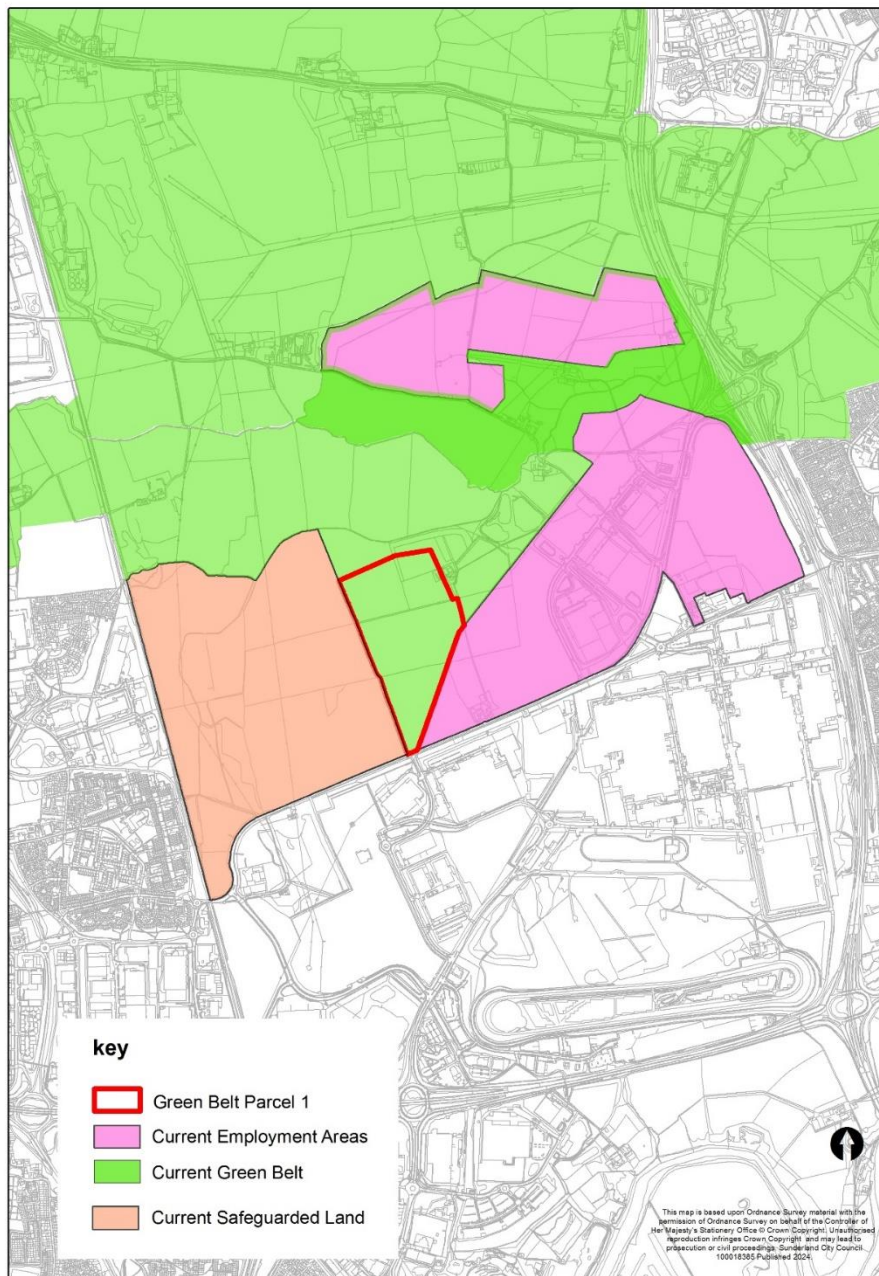
1	to check the unrestricted sprawl of large built-up areas;
2	to prevent neighbouring towns merging into one another;
3	to assist in safeguarding the countryside from encroachment;
4	to preserve the setting and special character of historic towns; and
5	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

6.12. A professional judgement has been used in each individual case to consider how much weight to attach to each contributing element affecting harm ratings. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm has been made. The four-point harm rating scale (Table 4) has been utilised: low/no, moderate, high and very high.

6.13. A high level of harm in relation to multiple Green Belt purposes, would constitute high overall harm to the Green Belt. A high level of harm on multiple purposes would be a higher level of harm, compared to just one of the purposes experiencing a high level of harm. Notwithstanding this, there may be instances where a very high harm rating against a single purpose could be significant enough to match or outweigh another parcel's very high harm ratings against two or more purposes.

### Green Belt Parcel 001 – Assessment

Map 6 Location of Green Belt Pparcel for assessment



### Harm associated with parcel 001

- 6.14. The site is located within the Tyne and Wear Green Belt. It is located close to the constructed part of the IAMP (the Gigafactory) and forms a narrow wedge of Green Belt between allocated development land within the existing IAMP AAP and the safeguarded land identified to meet longer term development needs within the Sunderland CSDP, which no longer forms part of the Green Belt.
- 6.15. There are no substantive buildings on the site, with the site principally being utilised as agricultural land. There are some incidental structures which relate to the former agricultural use of the land. Notwithstanding these small structures, the land is open.
- 6.16. However, as outlined in the maps on the previous page, to the east is allocated development land within the IAMP AAP area which is being developed for a gigafactory (currently under construction) and the completed units associated with the remainder of IAMP Phase One development. To the south is the A1290, beyond which is industrial development. To the west is the safeguarded land, which is identified within the Sunderland CSDP as a site to meet longer term development needs, and features as a proposed IAMP site allocation, as outlined in previous sections of this report. Given the context of the site, the parcel has a weak correlation with Green Belt purposes. The site does not form a continuous part of the Green Belt with the land to the east and west, with these areas having already been released from the Green Belt via the existing IAMP AAP and the adoption of the Sunderland Core strategy and Development Plan in January 2020.
- 6.17. The parcel is not associated with a historic town and therefore there is no impact on this purpose.
- 6.18. Given the weakness of the existing Green Belt boundaries outlined above, it is considered that the Usworth Burn located to the north would represent a more appropriate physical feature to establish a defensible Green Belt boundary. This would ensure a Green Belt corridor would be retained along an east-west axis, whilst retaining an acceptable separation between the urban area to the north of the IAMP site, at Fellgate.

### Harm to the Green Belt purposes

Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5
Low	Low	Low	Low	Equal

### Purpose 1: Check the unrestricted sprawl of large built-up areas

- 6.19. The parcel is sandwiched between the safeguarded land to the west which is identified in the CSDP as a longer-term development site and to the east by land allocated for development within the existing IAMP AAP. Given the narrow wedge of Green Belt that now exists on this east-west axis, it is not considered that the parcel (as a whole) would result in the unrestricted sprawl of large built-up areas, over and above that which has already taken place. The separation between the large built-up areas of Washington and Fellgate/

Follingsby would largely be retained as the area to be released would not extend any further north than the land already released from the Green Belt through the CSDP and the existing IAMP AAP.

6.20. The parcel is currently open land. However, the land is surrounded to the east and south by built development and to the west by safeguarded land which has been identified to meet longer term development needs. Given that the sites to the south and east now form part of the urban area, it is considered the area has a strong relationship with the existing urban area.

6.21. It is not considered that the release of this Green Belt parcel would have a significant impact on checking the unrestricted sprawl of large built-up areas.

**Purpose 2: Prevent neighbouring towns merging into one another**

6.22. The parcel represents a narrow wedge of land between sites which have either already been developed or have been identified to meet longer term development needs and no longer form part of the Green Belt. It is not considered that the proposals would result in the merging of Sunderland and Washington to any greater degree than already exists due to the existing industrial development which has already taken place. The separation between the large built-up areas of Washington and Fellgate/Follingsby would largely be retained as the area to be released would not extend any further north than the land already released from the Green Belt through the CSDP and the existing IAMP AAP.

6.23. The parcel is currently open land. However, the land is surrounded to the east and south by built development and to the west by safeguarded land which has been identified to meet longer term development needs. Given that the sites to the south and east now form part of the urban area, it is considered the area has a strong relationship with the existing urban area.

6.24. It is not considered that the release of this Green Belt parcel would have a significant impact on preventing neighbouring towns merging into one another, especially taking into consideration the merging which has already taken place between Sunderland and Washington.

**Purpose 3: Assist in safeguarding the countryside from encroachment**

6.25. The countryside within the context of the parcel is associated with the 'countryside' between the Tyneside conurbation to the north and Washington (which IAMP forms part of) to the south. The location of the parcel is sandwiched between the existing IAMP to the east and the safeguarded land to the west. In this regard given its sandwiched within an existing urban area it is not considered the parcel assists the safeguarding of the countryside from encroachment.

6.26. The parcel is currently open land. However, the land is surrounded on each side by built development or land safeguarded for long term development needs.

6.27. The relationship between the parcel and urban area is considered weak in how it safeguards the countryside from encroachment by virtue of its location. The most important



countryside setting within the locality is along the River Don corridor which would be retained as Green Belt.

**Purpose 4: Preserve the setting and special character of historic towns**

6.28. The parcel is not associated with or does not contribute towards the distinctive character or setting of a historic town.

**Purpose 5: Assist in urban regeneration by encouraging the recycling of derelict and other urban land**

6.29. The assessment (like other Green Belt assessments) has generally considered that all Green Belt land makes an equal contribution to this purpose.

**Outcome**

6.30. The above analysis has confirmed that the potential harm to Green Belt as a result of the proposals would be low. Given the requirement for the land to be made available for development, the economic benefits associated with the proposals, and the low harm identified to the Green Belt, it is considered that removal of the site from the Tyne and Wear Green Belt is acceptable and that exceptional circumstances exist which would justify its release for development.

## 7. Conclusion

- 7.1. This report has sought to justify the allocation of part of the Sunderland Core Strategy and Development Plan Safeguarded Land and a small wedge of the Tyne and Wear Green Belt for development in order to meet the future needs of the IAMP.
- 7.2. In order to establish this justification, this report has utilised evidence assembled as part of the IAMP Employment Land Position Statement (2024)<sup>4</sup> to provide a narrative and summarise the need case. In addition, it has sought to establish the unique economic proposition of the IAMP as a key automotive and advanced manufacturing cluster within the North East. This has recently been confirmed via the UK Government's Spring Budget 2024, which confirmed the site (including this additional land) as forming part of the North East Investment Zone. This will further unlock growth at the site.
- 7.3. The report has then sought to establish the future land requirements of the IAMP. It has done this by summarising evidence outlined in the IAMP Employment Land Position Statement (2024). This establishes a two twined approach by suggesting a need for release of the following land:
- Release of part of the safeguarded land – which has been established and justified in section 4 of this report.
  - Release of part of the IAMP AAP Green Belt – which has been established and justified in section 5 and 6 of this report.

---

<sup>4</sup> Referred to through this report as the Position Statement (2024).