

International Advanced Manufacturing  
Park Area Action Plan Examination in Public

# **Sunderland City Council and South Tyneside Council Local Planning Authorities' Responses to the IAMP AAP Inspector's Matters, Issues and Questions**

## **Matter 2- Overarching Issues**

Final Version 17/03/2017

## Matter 2 – Overarching Issues

### 2.1 Is the boundary of the AAP soundly based?

#### Councils' response;

The AAP boundary is considered to be soundly based. In accordance with the NPPF paragraph 182, the boundary is considered to be;

- Positively prepared – the boundary defined is able to meet the objectively assessed needs for the IAMP by accommodating 100 hectares of development land for automotive and advanced manufacturing B-Class uses plus 50 hectares of safeguarded land, together with 100 hectares of land for ecological mitigation.
- Justified –The boundary is considered to be the most appropriate boundary to deliver the quantum of development including land for mitigation. The boundary of the initial wider area of search was larger at the Green Belt and Site Selection Options stage (GBSSO), however following extensive consultation the boundary was reduced to reflect the preferred approach (option 1 with some elements of options 2 and 3). If the boundary was to be reduced further the objectively assessed needs of the sub-region's automotive and advanced manufacturing sectors and land required for mitigation could not be met.
- Effective - the IAMP boundary is considered to be effective as it has been defined through collaboration with the two Councils to ensure that the IAMP can be delivered in the most appropriate location and meet the development needs within in it.
- Consistent with National Policy – In accordance with paragraphs 152 -157 of the NPPF, the boundary will ensure that the AAP delivers sustainable development, allocates sufficient land to meet the objectively assessed needs together with safeguarding land for projected longer-term expansion beyond the plan period and contains a clear strategy for infrastructure and development, whilst ensuring the enhancement of the natural, built and historic environment.

Paragraphs 226 to 271 (pages 61-62) of Section 5 of the Statement of Compliance (PSD10a) sets out how the preferred option for the AAP was derived, which resulted in both the land area selected for development and the boundary of the AAP being able to both support this development and require potential mitigation. This was driven by the desire to ensure that no development parcel was too isolated or too small, that the developable area remained contained immediately west of the A19, to minimise the amount of land taken from the Green Belt to deliver IAMP and limit the amount of infrastructure required to connect the site to the A19, and to work within existing site constraints such as the River Don.

#### **And in particular: Does it include land which is not necessary to be included within the plan area, notably the triangle of land broadly between the northern and southern areas of proposed safeguarded land, which would remain as Green Belt?**

#### Councils' response;

The AAP sets out a policy framework for both the development of land and for the impacts of this development to be mitigated. The Policies Map shows both the extent of land to be developed and the extent of land to be used for potential ecological mitigation within the AAP boundary. The Ecology Technical Background Report (PSD14) provides information that there is nature conservation interest in the land to be developed and section 3.1.4 (page 17) of this report provides indicative 'no net loss' calculations and advises that there is a precautionary requirement for approximately 85 and 140 ha in accordance with the DEFRA developed method for biodiversity offsetting.

Whilst the land to be used for potential ecological mitigation is proposed to remain within the Tyne and Wear Green Belt as such use is compatible with the five purposes of Green Belt as set out in paragraph 80 of the NPPF, it is considered important that it is included within the AAP boundary to ensure that the policy framework can be applied and monitored, to ensure that the impacts of the development are being appropriately offset.

It is further noted that in the Housing White Paper (February 2017), the government proposes to amend the NPPF to indicate that where land is removed from the Green belt, local policies should require the impacts to be offset. The approach taken in the AAP is consistent with the proposed amendments to the NPPF.

**2.2 In broad terms is the list of matters which the AAP seeks to address soundly based? And in particular:**

**Would the plan pre-determine decisions to be taken in the preparation of forthcoming plans in respect of land outside the AAP boundary?**

**Councils' response;**

The AAP sets out a policy framework for both the development of land required for the IAMP and for the impacts of this development to be mitigated. The Policies Map shows both the extent of land to be developed and the extent of land to be used for potential ecological mitigation within the AAP boundary. The Ecology Technical Background Report (PSD14) provides information that there is nature conservation interest in the land to be developed and section 3.1.4 (page 17) of the report provides indicative 'no net loss' calculations and advises that there is a precautionary requirement for approximately 85-140 ha in accordance with the DEFRA developed method for biodiversity offsetting.

The AAP sets out a policy framework for the development of land for the International Advanced Manufacturing Park only and this features predominantly employment uses, supporting uses, required infrastructure and for the potential ecological impacts of this development to be mitigated. The AAP does not pre-determine the preparation of forthcoming plans in respect to the land outside the AAP boundary.

Both SCC and STC are in the process of preparing updated Local Plans and the evidence which informs these plans. Both forthcoming plans will assess the housing, employment, retail and infrastructure needs and determine the most suitable locations for growth across their respective local authority areas.

**Have the implications of the plan for the remainder of Sunderland and South Tyneside, particularly in terms of housing, employment land and agriculture, been robustly assessed? Is the plan soundly based having regard to these implications?**

**Councils' response;**

The implications of the plan for the remainder of Sunderland and South Tyneside in relation to housing and employment have been robustly assessed. The role, impact and extent of IAMP has been fully considered in preparing evidence for the emerging Local Plans in each area. For instance the uplift created in household formation as a result of job creation within IAMP and the relationship between the distinctive role of employment land within IAMP and that of the existing supply of local employment land.

Section 4.3.4 (page 44) of the Statement of Compliance (PSD10a) states that a series of Topic Impact Papers were produced in 2015 and then updated in 2016 to aid the four South of Tyne authorities to

understand the wider impacts of the IAMP, and to allow for these impacts to be accommodated in their wider plan making. The 2015 Topic Impact papers examined Skills (SD6), Housing Requirements (SD7), Employment and Land Supply (SD8) and Displacement (SD9) and focused on the impact of the B use class jobs that the IAMP was likely to provide. In 2016, the Skills, Housing and Displacement Impact Papers were updated to also examine the impact of jobs that the Hub was also likely to provide, in addition to the B use class jobs, as well as considering the wider multiplier ‘spin-off’ growth impacts that the IAMP might generate for the Region’s economy.

The Impact Papers presented different scales of impact and as part of the Duty to Cooperate process in producing their respective Local Plans, the four South of Tyne authorities are agreeing which scale of impact they should plan for, and where the additional requirements are accommodated.

In terms of agricultural land, the extract from [www.magic.gov.uk](http://www.magic.gov.uk) (the website provides authoritative geographic information from across government) provided on Figure 1 on page 4, shows that there is Grade 2 and Grade 3a Agricultural Land within the AAP boundary, however this land is not proposed to be allocated for the location of the employment uses. Engagement and subsequent representations (PSD8) to the draft AAP do not indicate significant concern regarding the impact on agricultural holdings or their viability.

**Is modification of the plan to allocate land for aspirational family housing necessary for the plan to be sound?**

**Councils’ response;**

The Councils do not consider this to be a sound approach. The role of the AAP is to provide a policy framework for an IAMP comprising primarily B-Class employment uses. In accordance with paragraph 83 of the NPPF, the Councils consider there are exceptional circumstances to alter the Green Belt boundary to provide land in close proximity to the existing Nissan plant and supply chain businesses for additional automotive and advanced manufacturing uses. There are no exceptional circumstances to amend the Green Belt boundary for accommodating housing need within the AAP boundary.

The Councils, through the preparation of their Local Plans, are currently establishing their housing requirements and identifying the most sustainable and appropriate locations for development. At this time, the Councils have not finalised their respective objectively-assessed housing needs and thus whether and to what extent there may be any exceptional circumstances to justify amending their Green Belt boundaries elsewhere to accommodate housing. Both authorities in developing their evidence are using the outputs of the Housing Impact Paper, as updated in 2016 (SD7) to ensure that any potential uplift in requirement from the IAMP is factored into their approach.

**Is reference within the plan to the potential for development to take place on land between the plan area and Washington necessary for it to be sound?**

**Councils’ response;**

The Councils do not consider it necessary to make such a reference to make the Plan sound. Land outside the AAP boundary will be assessed as part of the Local Plan to determine if it is suitable for development. The purpose of the AAP is to set a policy framework for the land within its boundary.

It is therefore not necessary to extend the AAP boundary to include land between the plan area and Washington and the rationale for the selection of the preferred option is clear.

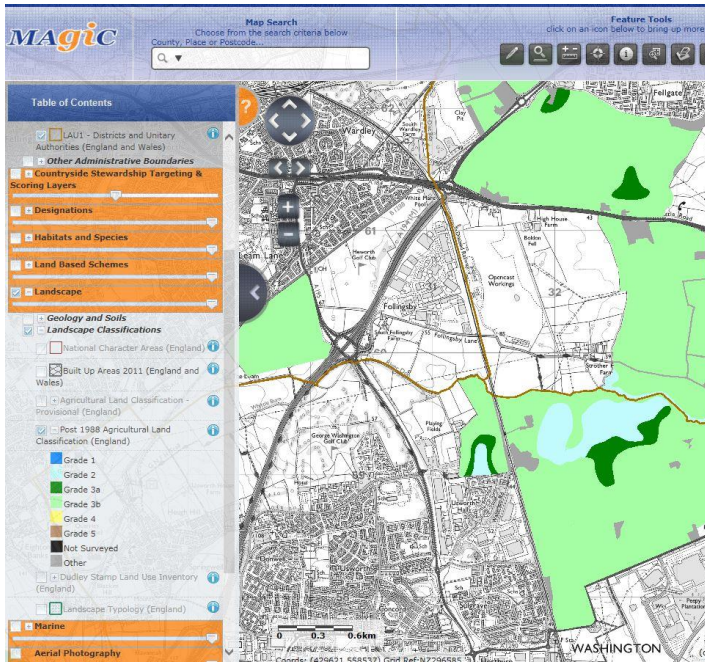


Figure 1: (<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>)