

**EXAMINATION OF THE INTERNATIONAL ADVANCED
MANUFACTURING PARK (IAMP) AREA ACTION PLAN (AAP)**

**Matter 3: Principal Uses, the mix of uses and the Hub
(Policies S1, S3, S4, S5 and S6)**

Statement made on behalf of W Gordon Proud Trust et al (“the interested parties”)

QUESTION 3.2: *Are the principal uses and mix of uses allowed for in policies S1, S3 and S4 soundly based? And in particular:*

Are policies S1, S3 and S4 likely to be effective in preventing development which would not accord with the IAMP concept?

Not as drafted in PSD1, with reference to the previous representations made to the Publication Draft AAP (PSD1) by the interested parties. The modifications to the policies are necessary to ensure the focus for development is the automotive supply chain and related advanced manufacturers only and not to attract general industrial uses to the site that can be accommodated on existing employment land allocations elsewhere.

Furthermore, the modifications to the policies are necessary to secure the quantum and type of ancillary uses for the development to be a sustainable development but to prevent uses not necessary to support delivery of IAMP.

Is there a need for more flexibility to allow development consistent with the IAMP concept coming forward in advance of an IAMP Development Consent Order?

Yes. The interested parties made representations to the Development Consent Order Pre-Application Consultation Process for the IAMP on 16 January 2017. The representations set out the interested parties views supporting the need for flexibility to secure delivery of development of the IAMP at the earliest opportunity. The representations are provided at Appendix 1 to this statement.

Are the modifications which the Councils have proposed (Docs PSD6/PSD7) to policies S1, S3 and S4 necessary for the plan to be sound?

The policies as drafted in PSD1 are not considered sound, for the reasons set out in this statement and therefore modifications are necessary. However, the interested parties do not consider the modifications are sufficient for PSD7 to be effective and fully justified and therefore sound.

Is policy S3 and its supporting text (para 103) consistent with policy S5 (as proposed by the Councils to be modified) in relation to the cumulative total size of retail units which would be permitted?

Within PSD7, Policy S3 criterion D states:

“Proposals for retail and leisure uses outside of the Hub as shown on the Proposal 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).”

The supporting text to Policy S3 at Paragraph 103 states:

“...protecting the IAMP AAP area from other uses such as general employment development, residential development and large scale retail or leisure uses above 1,500sqm gross floorspace.”

Policy S5 criterion A. v. states with respect to The Hub:

“a range of small scale retail units (Use Classes A1 and A3) up to a cumulative total of 1,500sqm gross floorspace, with no single unit being greater in size than 250sqm gross and”

Policy S5 criterion C states:

“The Hub shall be the primary location for ancillary uses. Provision of small scale retail provision (A1) up to a cumulative total of 1,000sqm gross floorspace will be permitted within the Northern Employment Area, to support the Principle Uses, with no single unit being greater in size than 250sqm gross.”

The Councils justification for modification of Policy S3 (Document PSD6 – proposed change reference PM43) is to ensure that retail and leisure uses are only located in the Hub. However, this is not the case as criterion D. of Policy S3 allows development of ‘modest scale’ ancillary retail and leisure uses within the Northern Employment Area. Firstly, how is this justified by the Council? This is essentially introducing a second ‘Hub’. There is no evidence presented to support this.

Secondly, if a second ‘hub’ in the Northern Employment Area is justified, there is no reference in the Policy S3 or the supporting text to what ‘modest scale’ constitutes only that the IAMP AAP area will be protected from large scale retail or leisure uses above 1,500sqm gross floorspace.

As Policy S3 relates to the Principal Uses, with the Scale and Quantum of the Principal Uses detailed in Policy S4, the interested parties believe Policy 3 criterion D should be amended to delete the second part of the criterion so it would read:

“Proposals for retail and leisure uses outside of the Hub as shown on the Policies Map shall not be permitted.”

We also suggest the words “above 1,500sqm gross floorspace” are deleted from paragraph 103.

Policy S5 then refers to a cumulative total of retail units being provided in the Hub of 1,500sqm gross, with a cumulative total of 1,000sqm gross retail floorspace in the Northern Employment Area, providing a total across the IAMP Area of 2,500sqm gross. No evidence has been provided to justify this level of retail development. Whilst modified Policy S5 details the Hub and ancillary uses that are acceptable including the quantum of floorspace and location, there is no detail provided for the 1,000sqm proposed in the Northern Employment Area. Criterion C of modified policy S5 should be deleted, in line with representations already made by the interested parties to the AAP.

The amendments to the plan proposed by the Councils documents PSD6/PSD7 do not address the concerns raised by the interested parties.

QUESTION 3.3: *Is the concept of The Hub, and are the detailed requirements in respect of it, set out in policies S5 and S6 soundly based? And in particular:*

Is the Hub appropriately located?

Yes. In paragraph 3.3.2.5 of PSD18 (Planning Policy Technical Background Report) the policy context is that complementary ancillary uses are required within the IAMP AAP boundary to allow existing and new employees the opportunity to access facilities and services locally, making development more sustainable.

As stated in PSD12 (Exceptional Circumstances for Releasing Land from the Green Belt – Technical Background Report) paragraph 158 bullet 2, the selected preferred option for IAMP 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. It is considered the ancillary uses should only be provided at the Hub, otherwise the purpose of the hub and the benefit of locating the ancillary facilities together is diluted and lost.

Are policies S5 and S6 clear as to what ancillary uses will be permitted and where?

Not as drafted in PSD1, with reference to previous representations made to the Publication Draft AAP (PSD1) by the interested parties.

Are the modifications which the Councils have proposed (Docs PSD6/PSD7) to policies S5 and S6 necessary for the plan to be sound?

The policies as drafted in PSD1 are not considered sound, for the reasons set out in this statement and therefore modifications are necessary. However, the interested parties do not consider the modifications are sufficient for PSD7 to be effective and fully justified and therefore sound.

Is the restriction on retail uses as proposed by the Councils (Docs PSD6/PSD7) to a total of 1,500sqm floorspace of A1 and A3 uses with a 250sqm maximum single unit soundly base?

The recommendation in PSD18 at paragraph 3.3.2.5 is for the AAP to include a policy which sets out which ancillary uses are permitted within the IAMP. It goes on to state, the development of ancillary uses will encourage the development of a sustainable scheme with appropriate facilities to meet the needs of both the residential and business community at the IAMP. This should be based on the evidence set out in PSD11 Commercial and Employment Technical Background Report of the appropriate types and quantity of ancillary uses, whilst allowing flexibility.

No such evidence is set out in PSD11. There is no consideration of appropriate ancillary uses and the quantum necessary to support the IAMP as a sustainable development. As previously stated in representations, the purpose is to provide business related facilities required by occupiers / tenants to assist with the operation of their business and for employees to make use of before starting work, after work and during breaks. As evidenced in successful industrial locations such as Team Valley in Gateshead, with reference to MainGate, complementary ancillary uses typically include small shops such as Greggs and newsagents; cafes; a bank; training and conference facilities; hotel; child-care facilities; and a gym.

Appendix 2 of this statement is schedule of the retail floorspace provided at MainGate. The retail uses are A1, A2 and A3 totalling 2,423.47sqm gross. Included on the schedule is a gym, FX Leisure, which occupies 1,845.2sqm and a 120-bed Premier Inn hotel. It is the view of the interested parties that the hub should replicate MainGate and that Use Class A2 should be included in the range of acceptable retail uses. Including A2 uses will not have an adverse impact on any existing centres.

We consider some parameters are required within Policy S5 for the total quantum of ancillary retail uses for the Hub to attract the type of retailers that will fulfil the objective of supporting the business community rather than creating a new retail centre and diverting trade from existing defined town centres. However, the parameters currently in the AAP policies have not been justified by evidence.