



**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)**

The Town End Farm Partnership are an “interested party” for the purposes of the EiP. They are uniquely qualified to answer questions in relation to the wider IAMP proposals as part of the AAP Examination as they are major freeholders of a significant part of the IAMP with the benefit of a live hybrid planning application supported by robust assessment forming the Environmental Statement and validation documents.

We respond to each question using the Inspectors references;

QUESTION 3.1: Is the case for IAMP supported by convincing evidence of need and viability?

The evidence base falls significantly short of that expected to make a robust judgement on viability. Two key documents exist which fail to provide sufficient evidence to justify the IAMP proposals, PSD11 and PDS21. These documents have been scrutinised by GVA and Frew Pain (Appendix 3) and Partners both firms with substantial experience in delivering development projects of all scales. Their advice is appended.

In their experience it is submitted that there appears to be very limited credibility and substance to the infrastructure costs which have been put forward. The vague figures outlined in Table 1 of PSD1 (Proposed to be deleted) and PSD21, which sets out the anticipated infrastructure costs and funding sources does not clarify the many externalities which can and will arise with a proposal of this nature.

One of our main concerns is the omission of any costs relating to the cost of acquiring the IAMP land, which we consider to be significant and un-accounted for. Whilst we appreciate document PSD21 relates to the delivery of infrastructure, as the land it is to be delivered on is not owned by the joint authorities it would seem misleading not to include it when considering the viability of delivering the proposal. The references to funding in this document are also vague. Clarity is needed on whether the relevant public and private sector partners are in place and if funding for each element has as yet been secured. Given that delivery is anticipated to commence in less than 9 months we find the evidence base unsound at this present moment in time.

Regarding need, again there is uncertainty regarding the stated figures. GVA question whether the figures presented justify the scale of the proposal noting that it is extremely questionable. PSD11: Commercial and Employment Technical Background Report states that 152,500 sqm of

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enquiries have been received by the combined councils from companies with enquiries in excess of 2,000 sqm. GVA are not convinced stating *“These are however only enquiries and do not represent an accurate way of assessing future take up levels. The report does not state over what period these enquiries were received. It is worth noting that historical take up levels of design & build projects in the north east are relatively low and only a fraction of the enquiries received would be likely to progress”*.

The plan evidence base is considered unreliable, GVA seek further clarity on the predicted development requirement *“the report [PSD11] equates these enquiries to a land take of 171 hectares (422.55 acres). Standard institutional development ratios range from 15,000 to 20,000 sq. ft. per acre. Using an average of 17,500 sq. ft. per acre would generate a need for 94 acres to satisfy all of the enquiries received by the councils. Perhaps we have misunderstood, but there seems to be a big disparity in these two figures.”*

We submit that the information contained within PSD11 and PSD21 does not justify the scale of the proposal being put forward. We also question its viability, there is simply a lack of proportionate evidence to support the AAP. Funding is critical to the success of this project. We ask that the Inspector notes that circa £70-80m needs to be found to pay for infrastructure alone within 9 months. As the figures are vague at best we submit that the proposals are not deliverable.

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?

PSD1 modifications to the policies are not necessary to ensure the focus for development is the automotive supply chain and advanced manufacturers. The plan is over a significant period of 15 years. This would in effect sterilise the site for the motor manufacturing industry. An amendment in the event of no clear prospect of delivery for such use allows alternatives. The future of Nissan in Sunderland is not clear, we submit that flexibility should be built in to the policy to ensure alternative options are available. The principal uses also should not be allowed to remain in perpetuity. The introduction of Principal uses in perpetuity is not welcomed, although we note that permitted development rights would be removed to deliver this we question its enforceability in the long term.

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?

We submit that greater flexibility is required. TEF made representations to the Development Consent Order Pre-Application Consultation Process in January 2017. Our representations set

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out our views supporting the need for flexibility to secure delivery of development of the IAMP at the earliest opportunity. An amendment was made to policy S1 (PSD1) to allow changes to be made and an application to come forward in advance of the DCO submission. Wording was introduced to allow, under certain circumstances, an application to come forward subject to policy and subject to comprehensive development. There is little flexibility to allow TEFP application which is currently live. We note that Nissan (NMUK) representations included reference to scenario where a key supplier wished to relocate before the DCO process, requesting “special measures” to be put in place to accommodate them. NMUK also stated that it would not wish to see development in an unplanned, uncoordinated manner.

We submit that the proposed modifications are welcome but do not allow development which complies with “comprehensive development”. We consider the wording is specifically worded to ensure no development outside of the DCO could be delivered. We reiterate our objection that there is no evidence to that the joint authorities can control both the delivery of IAMP and the end users. There is no clarification presented as to what comprehensive development means or equates to and no clarification has been forthcoming.

Is a statement in policy S4 that the majority of premises will be larger units necessary for the plan to be sound?

There is no control over the requirement/ likely size of unit within the masterplan. The evidence base considers a range of sizes/ manufacturers however this has not translated into on site delivery.

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 PSD7 are not considered sound, for the reasons set out in this Hearing Statement and therefore further major modifications are necessary, based upon proportionate evidence (NPPF para 182). TEFP do not consider the modifications are sufficient for PSD1 to be effective and fully justified and therefore in its present form is unsound.

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?

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. Criteria D of Policy S3 allows development of ‘modest scale’ ancillary retail and leisure uses within the Northern Employment Area. There is no justification for the second Hub area “N”. There is no evidence presented to support its location of use.

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

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?

The hub is not appropriately located for the reasons set out in TEFPP representations to the draft AAP in August 2016. In PSD18 (Planning Policy Technical Background Report) the policy context suggests 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.

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 PDS7 is proposed to be at the main entrance to Nissan. This would unquestionably have an adverse impact on transport and traffic. The resultant increase in traffic, is shown to have an impact on and impede the day to day activities and access and egress of the main Nissan plant. We submit that the location 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

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The Hub as submitted within the TEFPP 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 TEFPP 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 TEFPP 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

PSD9 fails to adequately address the commercial reality of the proposed Hub location and the very real traffic impact implications expressed within the WSP Appendices. We therefore consider that in the absence of evidence from the market and suitable highways justification relating to the merits of encouraging sustainable forms of movement other than the motor car, this policy and the proposals map are not soundly based.

TEFP would also like to draw the Inspectors attention to the fact that the hub location as proposed in PSD7 is to allow Nissan workers to access the A1 food retail/ Retail and food and drink premises. NMUK has three internal canteens providing for the shift workers. They are contracted out to external catering companies. NMUK also operate their own vending machines for other items including drinks and cold snacks. The Nissan staff have a 15 minute break during their shift and 30 minutes for lunch. Generally we are informed that staff either use the facilities or bring their own packed lunch. NMUK has a strict security policy and each member of staff leaving the building has to go through security. This does not allow much spare time to leave during shifts to shop or go off site for lunch.

TEFP submit that the AAP is not consistent with National Planning Policy, has not considered reasonable alternatives and has not been based on any presented evidence of need, demand or commercial reality.

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

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The policies as drafted in PSD1 are not sound, for the reasons set out in this Hearing Statement and therefore major modifications are necessary. The modifications are sufficient for PSD7 to be considered ineffective and not fully justified in accordance with NPPF justification and therefore the AAP is considered not to be sound.

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**Appendix 1
WSP Highways Note
26 August 2016**



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 TEF 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.

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

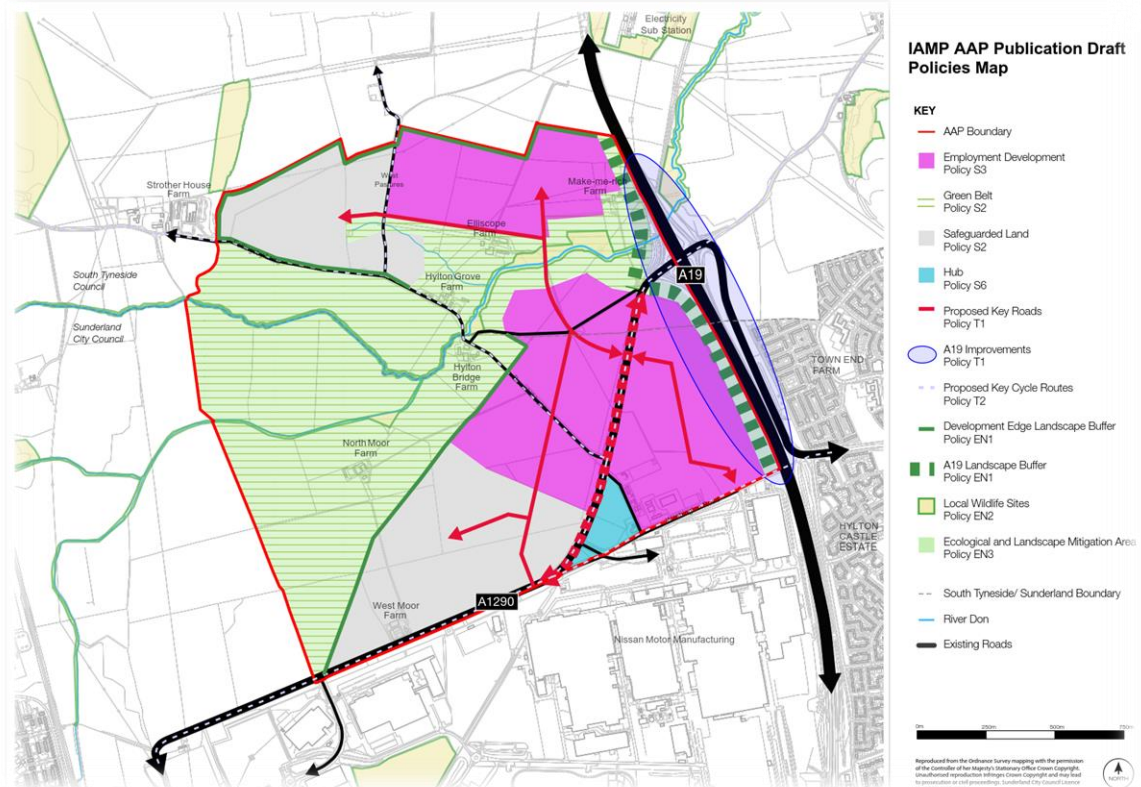
Policy S6: The Hub

- 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:

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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 TEFPP 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

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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	97.6%	19.9%	0	50.5%	42.4%	0	77.3%	22.1%	0	36%
A1290 WB - Ahead	44.7%	6		48.4%	6		49.1%	7		53.4%	7	
Nissan - Left	12.5%	1		19.3%	2		13.9%	1		21.5%	2	
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	60.8%	21.3%	0	30.9%	43.8%	0	49.6%	23.4%	0	19.4%
A1290 WB - Ahead	54.7%	9		66.4%	11		60.1%	10		73.1%	12	
Nissan - Left	13.2%	1		20.0%	2		14.6%	1		22.3%	2	
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	51.1%	21.3%	0	22.8%	43.8%	0	39.9%	23.4%	0	13.0%
A1290 WB - Ahead	59.6%	10		73.1%	13		63.4%	8		79.6%	14	
Nissan - Left	13.2%	1		20.0%	2		14.6%	1		22.3%	2	
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.

Appendix 2
Shandwick Properties
Commercial Review of Hub



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 Paul Carolin, who is a Director of Shandwick Properties, is the author of this report. Paul qualified as a chartered surveyor in 1995 and has over 25 years of commercial retail experience within the property industry. Paul has acted for many retail and commercial businesses both locally within the North East of England and nationally throughout the United Kingdom and Ireland. 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;

Shandwick Properties Limited

12-13 Lansdowne Terrace, Gosforth, Newcastle upon Tyne, NE3 1HN | T: 07772 299 932 | info@shandwickproperties.co.uk |
www.shandwickproperties.co.uk Registered in England and Wales. Reg. no. 06478554

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;



Shandwick Properties Limited

12-13 Lansdowne Terrace, Gosforth, Newcastle upon Tyne, NE3 1HN | T: 07772 299 932 | info@shandwickproperties.co.uk
| www.shandwickproperties.co.uk Registered in England and Wales. Reg. no. 06478554



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

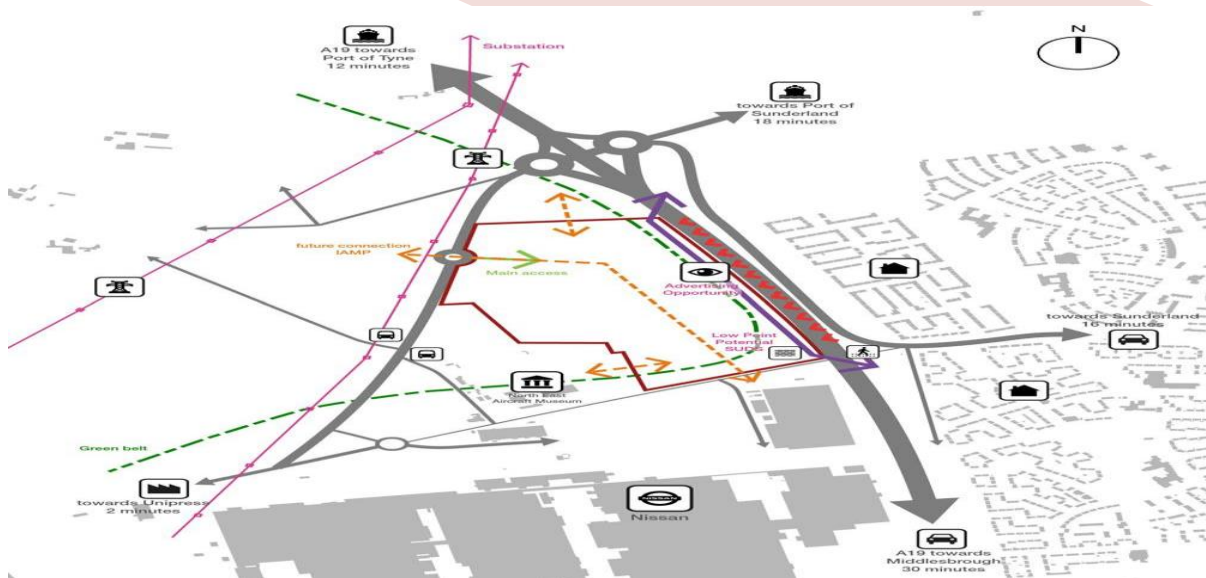
3.1 We largely agree with AAP proposals for the end use of the Hub. It makes good sense for retail and leisure uses to be complimented by nursery and childcare facilities, as well as a hotel and associated leisure and conference facilities. We would further comment that a car showroom use would be a 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 TEFP 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 TEFP 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 TEFP 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 TEFP 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 TEFP 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 TEFP location would alleviate the congestion problem.

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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.

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Appendix 3
GVA/ Frew Pain & Partners
Commercial Advice
17 March 2017

GVA

An **APLEONA** company

Our Ref: DYYC/TW/PR.L02 – (15B700351)

17 March 2017

Mr P Razaq
Kans & Kandy Wholesale Ltd
Foxcover 9
Admiralty Way
Foxcover Distribution Park
Sunderland
SR7 7DN

Dear Peter

International Advanced Manufacturing Park - Area Action Plan

We refer to the above and our ongoing professional advice in respect to Wear Point 55 development and the wider IAMP development.

On behalf of your property consultants, Frew Pain & Partners and ourselves, we have jointly reviewed the two documents PSD11:Commercial and Employment Technical Background Report and PDS21:Infrastructure Delivery Plan.

Analysing these two documents, we have real commercial reservations as to whether there is any realistic deliverability within the proposed timescales, given the collective overall picture and historical background.

From our joint development experience there appears to be very limited credibility and substance to the infrastructure costs which have been put forward. The vague figures outlined in Table 1, which sets out the anticipated infrastructure costs and funding sources does not clarify the many externalities which can and will arise with a proposal of this nature.

Serious consideration would need to be given to the uncertain nature of these proposed costs. It would be imperative to get more detailed break down and clarity, particularly bearing in mind the proposed start date is 2018, little more than nine months away.

It is difficult to comment fully as there simply isn't enough detail in these documents. However, one of our main concerns is the omission of any costs relating to the cost of acquiring the subject land. Whilst we appreciate document PSD21 relates to the delivery of infrastructure, as the land it is to be delivered on is not owned by the joint Authorities it would seem misleading not to include it when considering the viability of delivering the proposal.

The references to funding in this document are also vague. Clarity is needed on whether the relevant public and private sector partners are in place and if funding for each element has as yet been secured.

Collectively we feel there is a lack of substance in the figures put forward and doubt in them being either realistic or credible. In their present form they do not provide a platform to allow any level of detailed scrutiny. In respect of the demand section of document PSD11 which seeks to justify the need to deliver land for large scale floor plate development, we would broadly agree with this principle. There is undoubtedly a need to

deliver strategic employment sites in the area surrounding the Nissan plant and indeed the wider Sunderland/Washington and South Tyneside areas.

Whether the figures presented justify the scale of the proposal is however extremely questionable. The report states that 152,500 m² of enquiries have been received by the combined Councils from companies with enquiries in excess of 2,000m². These are however only enquiries and do not represent an accurate way of assessing future take up levels. The report does not state over what period these enquiries were received. It is worth noting that historical take up levels of Design & Build projects in the North East are relatively low and only a fraction of the enquiries received would be likely to progress.

We also note that the report equates these enquiries to a land take of 171 hectares (422.55 acres). Standard institutional development ratios range from 15,000 to 20,000 sq. ft. per acre. Using an average of 17,500 sq. ft. per acre would generate a need for 94 acres to satisfy all of the enquiries received by the Councils. Perhaps we have misunderstood, but there seems to be a big disparity in these two figures.

Therefore, whilst we agree there is a need to deliver further strategic land, we would question whether the information contained within these reports truly justifies the scale of the proposal being put forward.

We would also question its deliverability; there is a lack of evidence to support it at present. Clarity on what level the land acquisition costs will be at are crucial to the viability of the scheme and there appears to be no information on this contained in either report. Far more detail is required, particularly if the desired timescales are to be met.

Should you require any further advice or clarification on any points raised please contact either myself or James Pain.

Yours sincerely



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