

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 4- Proposed Revision of the Green Belt Boundary (Policy S1 and S2)

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4.1 Having regard to (a) the need for/viability of IAMP; (b) the potential for it to be located elsewhere; (c) the harm caused as a result of the loss of Green Belt; and (d) any other potential harm, does the submitted evidence convincingly demonstrate that exceptional circumstances exist to justify a revision to the boundary of the Green Belt in the AAP?

Councils' response;

The Councils consider that the exceptional circumstances to revise the Green Belt boundary to accommodate IAMP are supported by a robust evidence base.

a) The need for and viability of IAMP is set out in the Commercial and Employment Technical Background Report (PSD11) which draws together the evidence for the need for IAMP. Section 2.3 (page 12) describes how the proposition for additional land to capitalise on the growth of in the automotive and related supply chain activity in the North East of England was developed. Section 2.4 (page 18) describes that there is a shortage of available employment land in Sunderland and South Tyneside to accommodate such uses. Section 3.8 (page 37) describes that there have been ongoing inward inquiries for automotive and manufacturing related end users.

b) As set out in Section 4 of the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report, the Strategic Employment Study identified criteria for assessing location for automotive, manufacturing and distribution sectors as:

- Size - the Study concluded that the automotive, advanced manufacturing and distribution sectors require accommodation on large scale floor plates ranging from 9,000 to 37,000 sq. m, depending on the nature of operations.
- Proximity and Adjacency – stating that *“The trend towards near-shoring of suppliers close to OEM’s [Original Equipment Manufacturer] will continue.”*
- Transport links - businesses locating on the IAMP need to be able to easily access a skilled workforce, have strong links to supply chain and be able to transport goods to national and international markets.

Evidence was prepared to assess sites which could meet this criterion. The North East Independent Economic Review: Summary of Evidence (2012) (SD39) includes an overview of land and premises in the NE LEP area and notes that there is a concern across the NE LEP area that existing land and premises may not be in the right place or of the right quality to attract higher value added activities. The Review recommends increasing the supply of ‘market friendly’ sites. Further work assessed all local planning authorities Employment Land Reviews concluded that there were no other alternative large-scale development sites in the north East Region which had not been taken up, or reserved for a specific use(s) or have existing development commitments. Locally in Sunderland and South Tyneside, there is a shortage of available employment land – only just over 3 ha in ‘North Sunderland’ and the supply in Washington is insufficient to meet estimated demand in that area (position at Mach 2016) and no available sites in the southern part of South Tyneside. The evidence has concluded that there are no alternative sites in the North East which could accommodate IAMP.

c) The Councils have considered the harm to the Green Belt and undertaken a robust assessment to ensure that the most appropriate land is removed from the Green Belt. As set out in the Statement of Compliance and Section 5 of the Exceptional Circumstance for Releasing Land from the Green Belt Technical Background Report (PSD12) a full review of the Green Belt land North of Nissan has been undertaken.

Although Sunderland and South Tyneside have agreed a broadly common approach to their Green Belt assessments, they have used slightly different methodologies to undertake their Green Belt reviews against the five purposes as set out in the NPPF. Consequently, the Council's jointly commissioned a Green Belt and Site Selection Options Paper (GBSSOP) (SD4) to examine this. The GBSSOP therefore applied consistent methodological approach to the assessment of all of the land 'north of Nissan' across both Councils' areas. This included defining assessment area / parcels to ensure they met the NPPF's expectations on defensible boundaries. The assessment concluded that there were two distinct 'clusters of parcels' were considered to have a 'minor impact, which can be mitigated' these are:

- Land in the north west corner, including and in proximity to The former Wardley Colliery spoil tip and disposal point site(ST1, ST3, ST5 and ST8); and
- Land along the southern boundary of the assessment areas which immediately adjoins existing built development (N5 and N10 to N19).

The land 'North of Nissan' is a large area and more than the amount of land needed for IAMP. To inform the selection of options to be considered further and develop the Preferred Option for the IAMP Area Action Plan (AAP), The Green Belt and Site Selection Options Paper (2015) (SD4) included a technical review of transport, utilities, environment and ecology, flood risk, landscape, geotechnical and planning policy matters together with the Vision and Objectives for IAMP, to develop three alternative 'development options'. Each option included 170ha of total land take for development and safeguarded land, a landscape and ecological mitigation corridor, a hub for ancillary uses and avoidance of significant ecological constraints, and development of land outside of flood zones and not within 50m of any watercourses. The preferred option was the option considered to be deliverable whilst not causing undue harm to the Green Belt.

As a result it is considered that the Preferred Option as set out within PSD1 and PSD7 meet the requirements of Paragraph 14 of the NPPF, which states that: *"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that: local planning authorities should positively seek opportunities to meet the development needs of their area."*

As is set out through the evidence library supporting the proposed plan the economic and social benefits of the proposed IAMP to the North East as a whole outweigh the adverse impacts of removing this land from the Green Belt boundary.

d) Section 8 (page 50) of the Sustainability Appraisal (PSD2) identifies the significant effects of the IAMP AAP. Likely significant negative impacts include: the generation of greenhouse gases, increased traffic and consequent increase in greenhouse emissions and noise impacts, development in close proximity to the River Don may increase flood risk, temporary environmental impacts from construction phases, removal of land from the Green Belt and impacts on biodiversity and habitats. Section 10 of the Sustainability Appraisal (PSD2) sets out how the proposed AAP policies mitigate the negative significant effects.

And in particular: Has consideration been given to the location of IAMP on sites not currently allocated for employment use and not located in the Green Belt?

Yes, the Councils assessed neighbouring authorities SHLAA's to identify if there were any sites available of suitable scale, approximately 80ha. The sites available did not meet the criterion necessary, illustrated in the Table below, there are no sites of a suitable size that are currently available for development.

	SHLAA Ref	Site Name	Hectares	Capacity	SHLAA Status	Planning Status	Notes
Northumberland	4652	Cramlington South West Sector (Phase 1)	34.14	706	Deliverable & Developable	Minded to approve (awaiting S106)	Collectively all three sites are known as the Cramlington South West Sector and have been split up in the SHLAA.
Northumberland	4703	Cramlington South West Sector (Phase 2)	124.02	2000	Deliverable & Developable	Permitted not started	
Northumberland	6886	Cramlington South West Sector (Phase 3)	26.27	850	Deliverable & Developable	No planning Status	
North Tyneside	-	Killingworth Moor	192.45	2000	Local Plan Allocation	No Planning status	Allocated for housing
North Tyneside	-	Murton	243.27	3000	Local Plan Allocation	No Planning Status	Allocated for housing

Table 1: SHLAA site consideration

What is the mitigation referred to in section 6 of the *Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report*?

Councils' response;

Section 6.6 (page 40) of the of the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) describes the approach taken to minimise the amount of land being removed from the Green Belt. The AAP would only revise the Green Belt boundary to accommodate development parcels and safeguarded land. This would result in land immediately north and south of the River Don, which performs an environmental and drainage function, remaining within the Green Belt.

The mitigation land (referred to on the policies map) is required for ecological and landscape mitigation and is an appropriate use in the Green Belt. The approach for identifying this land in the AAP is consistent with the NPPF, Paragraph 109 which states that the planning system should contribute to and enhance the natural and local environment by: Protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimise impacts on biodiversity; and providing net gains in biodiversity where possible. The amount of land is indicative, as the amount of land required is unknown but development must ensure no net loss. The Ecological Technical Background Paper (PSD14) section 3.1.4 page 17 identifies the requirement to be between 85 and 140 ha in size, is in accordance with DEFRA developed metrics.

Does section 7 of the *Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report* adequately explain and justify the planning balance which has been undertaken in concluding that there is “a clear exceptional circumstances case” for removal of land currently in the Tyne and Wear Green Belt?

Councils' response;

Section 7 (page 43) of the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) considers the need for IAMP, the location of IAMP, the impact of IAMP on the Tyne and Wear Green Belt, the impact on the role and purposes of the Tyne and

Wear Green Belt, promoting sustainable patterns of development and meeting longer term development needs. Section 6 of the report acknowledges that the delivery of IAMP would have an adverse impact on the purpose of the Tyne and Wear Green Belt as it would lead to an encroachment on the countryside.

NPPF Paragraph 83 advises that alterations to Green Belt boundaries should only be made in exceptional circumstances. In February 2017, the government published its Fixing a Broken Housing Market White Paper which reinforces the government position on altering Green Belt boundaries only in exceptional circumstances. The paper proposes to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified requirement, including:

- Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- The potential offered by land which is currently underused, including surplus public sector land where appropriate;
- Optimising the proposed density of development; and
- Exploring whether other authorities can help to meet some of the identified development requirements.

The Councils consider that there are exceptional circumstances to release land from the Green Belt for IAMP. To present the reasons and justification in this case, the Councils prepared an Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12). The purpose of this report is:

- to justify the needs and demands for requiring land to meet the needs of the growing automotive and advanced manufacturing sector in the North East (Section 3);
- Set out the locational requirements for IAMP including the need to be in close proximity and adjacency to final assembly plants, to be of a sufficient scale to meet supply chain requirements which ranges in floor plates size from 9,000 to 37,000 sq. m¹, to be of a scale which enables companies to cluster and to be in an accessible location with strong strategic transport links;
- To demonstrate that the Councils undertook a comprehensive review of available land in the North East and concluded that although there are some large scale sites in the North East, there was not a suitable brownfield site which could fulfil the above criteria; and
- To assess the impact of land being removed from the Green Belt and determine the most appropriate location for IAMP which would promote a sustainable pattern of development in accordance with paragraph 84 of the NPPF.

The Sustainability Appraisal (Updated August 2016) (PSD2) provides a balanced assessment of the plan in Social, Economic and Environmental terms. The Sustainability Appraisal includes a number of objectives, which are met through the AAP policies (as set out within the PSD10a Policy Soundness Tables). These objectives are:

- Improve health and well-being of people and communities;
- Promote and enhance Sunderland and South Tyneside's culture and heritage;
- Create an integrated strategic road and public transport network within Sunderland and South Tyneside and to the wider region; and
- Promote sustainable transport choices for employees, residents and visitors.

¹ SD28m Sunderland and South Tyneside Strategic Employment Study (2013), PWC

Furthermore Section 8.3, Health Impact Assessment of the Sustainability Appraisal (Updated August 2016) (PSD2) concludes that:

- There are potential health impacts associated with the development of IAMP, primarily related to short-term construction stage impacts (noise, pollution etc.) but also potentially long-term impacts arising from increased road traffic in the area (noise, pollution etc.); and
- Several elements of the AAP have positive contributions to health and well-being through provision of support for active travel modes (cycling/walking/ horse riding) and through the development of high quality public realm and also leisure/recreation uses within IAMP.

As set out in Table 8 (Mitigating Significant Effects) of PSD2, Policies T2 and T3 support walking/cycling/pedestrian transport, and support the development of integrated and enhanced public transport systems. Policy EN4 considers the impact on neighbouring occupiers and residents and seeks to minimise disturbances from noise, odours, etc. The policy indicates that proposals will be supported where measures to take account of amenity considerations are demonstrated.

The Councils consider that section 7 of this report adequately explains and justifies the planning balance for removing land from the Tyne and Wear Green Belt.

4.2 Is the revised Green Belt boundary proposed in the plan soundly based and consistent with national policy, having particular regard to:

Land around West Moor Farm?

Councils' response;

It is considered that the approach to the revised Green Belt Boundary is soundly based and consistent with National Policy. Paragraphs 266 to 271 (page 61) Section 5.1.2 of the Statement of Compliance (PSD10a) describes how the selection of the preferred option for the AAP boundary was made, including how land would be used within it, having regard to a number of factors including ensuring a recognisable, permanent, physical feature, being selected as a new Green Belt boundary that is deemed defensible and to ensure that no development parcel was too isolated or small. National Grid prefers that buildings are not built directly beneath its overhead lines (PSD8, representation 180816/NG/012). Developing beyond the pylons could result in small isolated parcels.

Section 6.7 (page 40) of the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) describes the rationale for the selection of a new Green Belt Boundary around West Moor Farm and sets out that the National Grid Pylons are considered a defensible boundary (in accordance with Paragraph 85 of the NPPF) as they will remain a permanent feature in the landscape during the lifetime of the AAP and beyond.

Land in the River Don corridor between the northern and southern Employment Development areas

Councils' response;

The Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) makes the case to remove land from the Green Belt that is required now for development and for safeguarding. It is not proposed to remove all land within the AAP boundary from the Green Belt. In particular the River Don Corridor is an important area for biodiversity and the AAP policies (IN2, EN2 and EN3) seek to ensure this is maintained and enhanced. The new Green Belt boundary proposed to the south of the Northern Employment Area and to the north of the Southern Employment Area follows the alignment of existing field boundaries as respects a 50 metre buffer either side of the River Don. It is considered that this meets the requirements of Paragraph 85 of the NPPF.

4.3 Does the plan provide adequate guidance on the possible future release of safeguarded land? Are any modifications to the plan in respect of this necessary for it to be sound?

Councils' response;

The Monitoring Framework proposed within the Publication Draft AAP (PSD1) informed when the safeguarded land would be released, however this was further clarified through the Monitoring Framework (as proposed (PM 94, PSD6 and Page B10 of the AAP incorporating Proposed Modifications), which provides a more adequate trigger for guidance as to when a review of the safeguarded land should be completed. The modification also demonstrates the sources through which delivery will be monitored in order for a review to be triggered. These modifications are included to ensure the delivery of the plan and employment development on land subject to the AAP and are therefore considered to result in a sound plan.

4.4 Are the modifications which the Councils have proposed (Docs PSD6/PSD7) to policy S2 necessary for the plan to be sound and are they consistent with national policy?

Councils' response;

The proposed modifications to Policy S2 are not necessary for the plan to be found sound, but do provide additional clarity about what activity is suitable within the safeguarded land, and the need for existing and new Green Belt boundaries to be defensible. Paragraph 83 and 85 of the NPPF require the permanence of boundaries to be considered and provide criteria for establishing new Green Belt Boundaries, it is considered that the modifications are consistent with national policy.