

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 5- Design and the Historic Environment (Policies D1 and D2)

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5.1 Are the requirements of policies D1 and D2, in respect of masterplanning and the public realm, soundly based?

Councils' response;

The requirements of Policy D1 and D2 are justified and evidenced within the Technical Background Reports, in particular Section 4 and Paragraph 133 within the Design Technical Background Report (PSD13), which provides recommendations for the AAP and Section 4.2, *Key Proposed Interventions to be progressed through the AAP*, of the Landscape Technical Background Report (PSD17).

Proposed modifications to Publication Draft Policy D1 are proposed in order to align the policy with the NPPF and the representation received to the Publication Draft consultation from Historic England. The initial requirements of D1 were not considered to provide sufficient protection for heritage assets as raised by Historic England. Accordingly, modifications are proposed (PM 60 of PSD6) to strengthen this policy in relation to historical assets. The modifications are proposed to reflect the statement of common ground agreed with Historic England, provided within Appendix 2 of PSD8.

Policy D2, as proposed, includes a small number of changes proposed to be included for clarity and consistency (PM 61 of PSD6) with remaining policies and text within the plan.

Soundness Table 5.2.6 (page 75) and 5.2.7 (Page 76) of the Statement of Compliance (PSD10a), assesses the soundness of Policies D1 and D2 as proposed, respectively, including the modifications set out above and conclude these policies to be sound.

5.2 Is the plan consistent with national policy and otherwise soundly based, in relation to the protection of heritage assets? Are there extant policies of the Sunderland and South Tyneside development plans which provide appropriate protection for these assets?

Councils' response;

On reflection, Publication Draft Policy D1 was not considered by Historic England to be consistent with National Policy and in particular the NPPF. As set out above, concern was raised by Historic England regarding the lack of protection afforded to heritage assets within the AAP. Accordingly, modifications, as set out in PM 60 of PSD6, are proposed to strengthen this wording and provide additional protection to heritage assets, archaeology, their setting, whilst also promoting their enhancement. The plan as proposed is consistent with national policy.

As set out within paragraphs 107-118 of the Planning Policy Technical Background Report (PSD18 pages 18-19) Policy DM6 of the South Tyneside Development Management Policies Document 2011 is extant and promotes the protection and enhancement of listed and non-listed heritage assets. Policies B8 and B10 of Sunderland City Council's Unitary Development Plan also remain extant. These policies were adopted in 1998 and were saved in 2007. The AAP is not intended to reproduce the policy approach that is set out in the NPPF and the local development plan but should be read alongside these documents in decision making. In this respect the AAP is consistent with Local Development Plan policy and the NPPF with respect to the approach to protecting and enhancing heritage assets.

The inclusion within policy for the protection of heritage assets has been agreed with Historic England in the statement of common ground set out in Appendix 2 of PSD8.

5.3 Are the modifications which the Councils have proposed (Docs PSD6/PSD7) to policies D1 and D2 and section 2.5 necessary for the plan to be sound?

Councils' response;

Amendments to Policy D1 are proposed to strengthen the protection of heritage assets in accordance with the NPPF and to reflect the Statement of Common Ground agreed with Historic England. Section 3.1.1 of PSD5 Page 4 (SA Addendum) explains that Historic England required the changes proposed in PM 60 in order for Historic England to agree to the plan being sound. Their response is found in Appendix 2 of PSD8.

The proposed modifications to Policy D2 are not necessary for the plan to be found sound, but do provide additional clarity.

Modifications to Section 2.5 of the AAP provides additional clarity on existing historical assets found within the AAP boundary. With the exception of old railway infrastructure, these are acknowledged elsewhere within the AAP and therefore this amendment is not relating to matters of soundness but ensures that the plan is consistent in its approach throughout.

Further assessment of the soundness of policies as proposed, is set out in sections 5.2.6 and 5.2.7 of the Statement of Compliance (PSD10a), pages 76 and 77 respectively, both of which are concluded to be sound.