

**INTERNATIONAL ADVANCED MANUFACTURING PARK
AREA ACTION PLAN**

EXAMINATION IN PUBLIC

**Response to Inspector's Matters, Issues and Questions
Made on Behalf of the Church Commissioners for England**

Matter 8: Implementation, Delivery and Policies Map (Policies Del1 and Del2)

Preamble

- 8.1 On behalf of our client, the Church Commissioners for England ("the Commissioners"), we write to provide comments in response to the Submitted International Advanced Manufacturing Park ("IAMP") Area Action Plan ("AAP") following our previous representations to the Publication Draft of the AAP in September 2016. The AAP is being prepared jointly by South Tyneside Metropolitan Borough Council and Sunderland City Council.
- 8.2 The Commissioners own land within the AAP boundary, some of which is identified as development land, whilst other elements have been identified as safeguarded land and ecological and landscape mitigation land. A plan outlining the extent of the Commissioners' land ownership is found in **Appendix A** along with the ownership boundary being superimposed on the current draft of the AAP Policies Map. In total the Commissioners' land makes up around 72 ha or around 25% of the total AAP area.
- 8.3 As a result of their land ownership, the Commissioners have a strong interest in the emerging IAMP and are therefore keen to engage in this examination and assist in preparing a sound plan which is positively prepared, justified, effective and consistent with national policy.
- 8.4 It is recognised that the emergence of the IAMP is important for the economies of South Tyneside and Sunderland and that this has been acknowledged by Central Government as the IAMP is classified as a Nationally Significant Infrastructure Project ("NSIP"). In this respect the Commissioners fully support the IAMP concept given its potential to boost jobs and growth in the area and its ability to assist existing businesses such as Nissan.

- 8.5 Nevertheless, as the AAP will play a pivotal role in providing the planning framework which will support the delivery of the IAMP, it is imperative that the document is robust and is supported by up to date and comprehensive evidence.
- 8.6 Our statements should be read alongside our previous written representations. We trust our input will contribute towards the adoption of a 'sound' Plan.
- 8.7 Matter 8, which covers implementation, delivery and policies map with the AAP is considered below. This Matter specifically explores Policies Del1 and Del2 of the AAP to ensure that the IAMP and its supporting infrastructure are ultimately deliverable.

Implementation, Delivery and the Policies Map

1. Are the requirements of policy Del1, in respect of a phasing strategy, mitigation strategy and a management strategy, soundly based? Are the modifications to the policy proposed by the Councils (Docs PSD6/PSD7) necessary for the plan to be sound?

- 8.8 Whilst the Commissioners acknowledge the need to ensure appropriate phasing of the IAMP to enable infrastructure to be put in place to support the development, the issue of land ownership also needs to be taken into account. This is vitally important as without willing landowners, certain elements of the development may be delayed in coming forward or not come forward at all. Consequently, Policy Del1 needs to reflect and reference this and ensure any phasing strategy put forward is ultimately deliverable on these terms. Without this we believe the policy is unsound on the basis of being ineffective. To ensure a sound approach we suggest that at the end of the first paragraph of Policy Del1 that the following wording is inserted:

"...which takes into account the relevant delivery issues of each phase including land ownership."

- 8.9 The third paragraph of Policy Del1 currently requires the submission of a Mitigation and Management Strategy with any application for development at the IAMP. This needs to address *inter alia*, ecology measures. We have commented in Matter 2 in relation to our view regarding the robustness of the quantum and location of the ecological mitigation land and that ultimately the approach in the AAP to this land is unjustified at present. Policy Del1 only adds to this uncertainty as it acknowledges that a Mitigation Strategy including ecological measures should be determined at the application stage. This raises further fundamental questions over the nature and extent of the mitigation land offered on the AAP Policies Map

(PSD7 Appendix A) and whether it can be justified prior to a Mitigation Strategy coming forward for the IAMP development. Indeed, it is likely to be the Mitigation Strategy and measures contained within it which will define the scale and location of any ecological mitigation, therefore to be so prescriptive on the AAP Policies Map is unsound on the basis of being unjustified and ineffective. We would therefore advocate a much more flexible and less prescriptive AAP Policies Map to ensure that the approach to the AAP is sound. We look forward to discussing this further at the examination.

2. Does the plan provide sufficient and appropriate guidance on land assembly to ensure its effective implementation?

8.10 As one of the main owners of land within the AAP boundary, the guidance on land ownership and assembly is important to the Commissioners. The latest draft of the IAMP AAP (PSD7) does not provide definitive guidance on this issue only that the Council will seek to negotiate with landowners to assemble the site for IAMP (paragraphs 17 and 98). The Commissioners find this approach inadequate especially given that the NSIP consenting process will bring together planning, land assembly and environmental and access matters into a single application. As such the AAP should offer more assurances to landowners over the process.

8.11 Since the formulation of the IAMP, there has been little communication with the Commissioners as landowners and whilst the Commissioners see the merit in the IAMP and wish to be a willing landowner, to date there has been little attempt to reach an agreement on a way forward. The Commissioners would expect there to be useful and constructive dialogue through the AAP process and a number of options discussed including the possibility of an arrangement whereby the Commissioners can maintain the freehold on their land. Unfortunately, such dialogue has not taken place to date and as such the Commissioners seriously question the AAP's soundness and believe the current approach will lead to an ineffective plan that will struggle to be implemented. We look forward to discussing this in more detail at the examination.

3. Are the requirements of Policy Del2 likely to be effective in ensuring that mitigation required in respect of development within the AAP area is secured at the appropriate time? Are the modifications to the policy proposed by the Councils (Docs PSD6/PSD7) necessary for the plan to be sound?

8.12 Whilst the Commissioners do not have any specific issue with the wording of Policy Del2, we would reiterate our concerns outlined above that the current AAP Policies Map (PSD7 Appendix A) designates a significant amount of ecological and landscaping mitigation land in specific areas of the AAP boundary. We believe this predetermines the scale and nature of the ecological mitigation that is required as Policy Del2 (along with Policy Del1) clearly shows

that the exact form of any mitigation is still yet to be determined (through the submission of a Mitigation Strategy). As this is the case, a greater degree of flexibility should be applied to the AAP Policies Map and as a result of this all of the ecological and landscape mitigation land outlined in the AAP Policies Map should be taken out of the Green Belt in order to provide as much flexibility as possible for the the IAMP and address our comments regarding safeguarded land in Matter 2.

4. Is it necessary for the soundness of the plan for Table 1 (Infrastructure Delivery Schedule) to be deleted, as proposed by the Councils, and instead for there to be a separate Infrastructure Delivery Plan? Is this revised approach soundly based?

- 8.13 The Commissioners do not have any specific comments relating to this question but would reiterate that the provision and phasing of infrastructure is important. We note the preparation of a separate Infrastructure Delivery Plan ("IDP") (PSD21) and whilst on the whole we cannot see any soundness issues with this approach, we would expect to see the document specifically referenced within the AAP and tied to specific policies.
- 8.14 Whilst this appears to be the case and infrastructure is covered by Policy Del1, there does seem to be an inconsistency as Policy Del1 requires details of phasing (including infrastructure provision) to be submitted as part of the NSIP application process but the IDP within Table 1 appears to ascribe specific dates as to when infrastructure will be delivered. We would support the flexibility in Policy Del 1 and therefore believe that to ensure consistency and soundness, the IDP should be amended accordingly.

5. Having regard to paragraphs 173 – 174 of the National Planning Policy Framework is there evidence that, cumulatively, national and local policy standards/requirements would not put implementation of the AAP at serious risk?

- 8.15 Paragraphs 173 and 174 of the NPPF seek to ensure that development plan documents do not propose obligations or policy burdens which would threaten the viability of future development. Ordinarily it is our experience that development plan documents are accompanied by viability information to show that the policy requirements contained in the development plan do not unduly affect the viability of the schemes proposed.
- 8.16 Whilst the Infrastructure Delivery Plan which accompanies the AAP (PSD21) does list the infrastructure needed to deliver the IAMP and Polices Del1 and Del2 of the IAMP AAP (PSD7) require the delivery of this infrastructure, there is little information on the implications of this on the viability of the IAMP on an individual or cumulative basis. Likewise, there is little in the way of commentary on the implications of policy requirements (local and national) on the viability and deliverability of the IAMP. As a landowner, the Commissioners believe that such

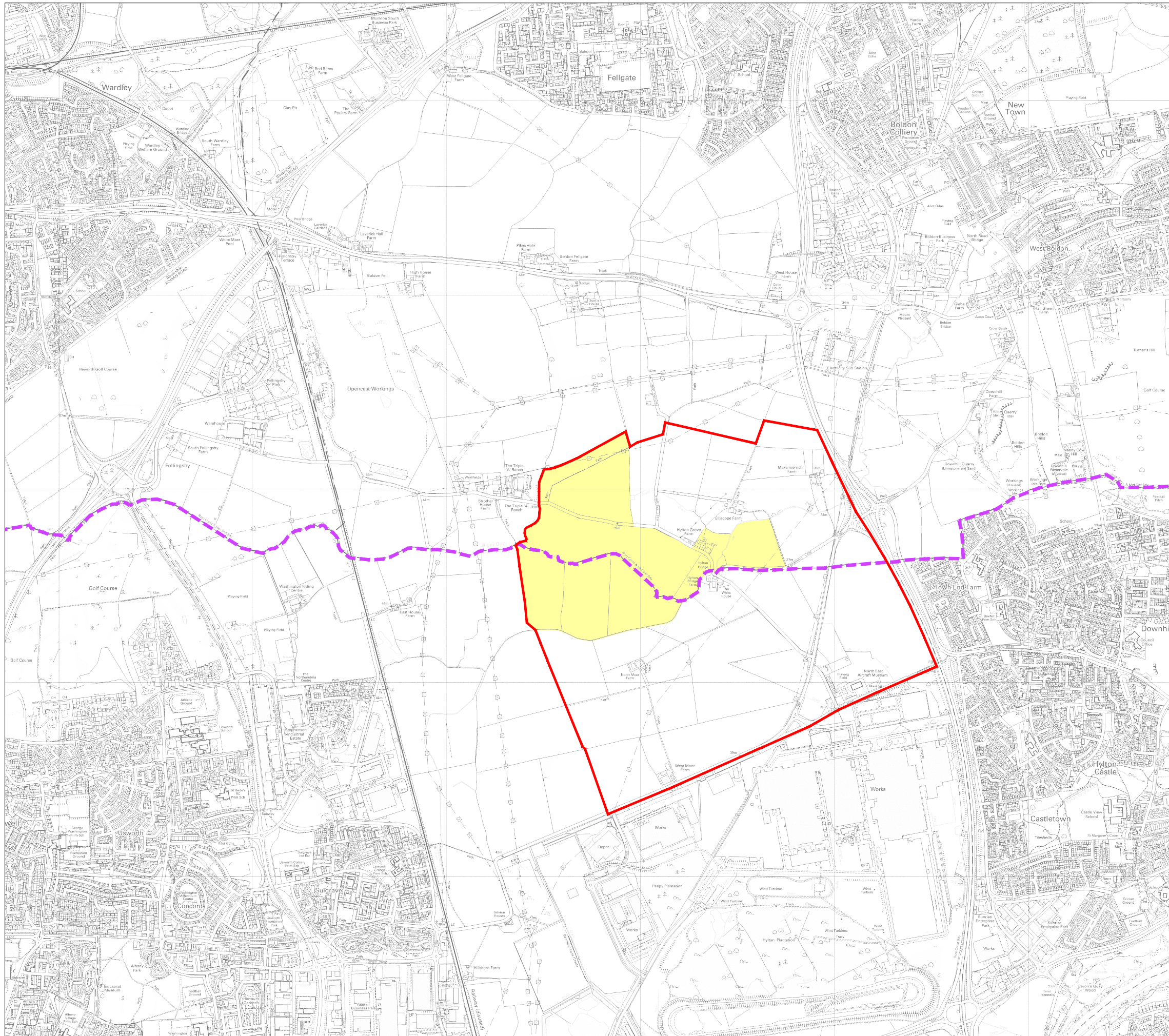
information is a vital component to the AAP process as it is likely to impact on any agreements made in terms of land through the NSIP process. Indeed, without sufficient detail regarding the viability of the AAP, the Commissioners deem the plan to be unsound on the basis of being ineffective and inconsistent with national policy.

- 8.17 As a result of this we would expect the Councils to present a clearer idea of viability at the examination and look forward to discussing this further.

6. Is the Policies Map (Appendix A of the plan) justified? Are the alternations to the Map proposed by the Councils (Appendix A of PSD7) necessary for it to be justified?




- 8.18 As alluded to in our previous comments above and in our response to Matter 2, our view is that the AAP Policies Map (PSD7 Appendix A) is unsound on the basis that it does not allocate enough development land to allow sufficient future growth at the IAMP (over and above the 'moderate' scenario), creates substantial areas of ecological and landscape mitigation without necessarily justifying this quantum or specific location and seeks to retain areas of the AAP within the Green Belt which the Commissioners believes does not allow for sufficient flexibility for future development at the AAP. Overall, we therefore have concerns that the AAP Policies Map is unjustified and not positively prepared.
- 8.19 To remedy this we believe the AAP Policies Plan should be less prescriptive at this stage and essentially address issues such as access and an indicative location for the proposed hub but to leave issues concerning exact location of development cells, safeguarded land and ecological and landscape mitigation to the application stage where these elements can be informed by further scheme specific assessments and occupier requirements.

Appendix A



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Revision	Date	Drn	Ckd

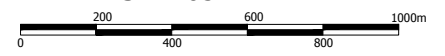
-  Borough Boundary
-  Land Owned by the Church Commissioners
-  AAP Boundary

Project
South Tyneside Estate



Drawing Title
Land Owned by Church Commissioners

Date 13.03.17	Scale 1:20,000@A3	Drawn by M.S.	Check by C.M.
Project No 19200	Drawing No SL-P-05	Revision -	



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IAMP AAP Policies Map

KEY

Policies

- AAP Boundary
- Northern Employment Area
- Southern Employment Area
- Green Belt
- Policy S2
- Green Belt Boundary
- Safeguarded Land
- Policy S2
- Hub
- Policy S5
- Proposed Key Roads
- Policy T1
- A19 and Local Road Improvements
- Policy T1
- Proposed Key Cycle Routes
- Policy T2
- Proposed Minor Roads
- Policy T2
- A19 Landscape Buffer
- Policy EN1
- Local Wildlife Sites
- Policy EN2
- Ecological and Landscape Mitigation Area (indicative)
- Listed Buildings
- Policy D1

Context

- South Tyneside/ Sunderland Boundary
- River Don
- Existing Roads
- Tyne and Wear Green Belt
- Church Commissioners Land

0m 250m 500m 750m

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