

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 8- Implementation, Delivery and the Policies Map (Policies Del1 and Del2)

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8.1 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?

Councils' response;

The infrastructure requirements for the IAMP– highways, drainage, environmental – are significant and need to be implemented in a coordinated and phased approach. For example, there is a close interrelationship between the IAMP scheme and the two Nationally Significant Infrastructure Projects being progressed by Highways England in respect of the adjacent A19 Trunk Road. A phasing strategy will be required to ensure that the provision and occupation of development floorspace on IAMP can be supported by the timing of capacity enhancements on the A19 Trunk Road. Similarly, the implementation of the ecological mitigation measures on the site needs to be coordinated and phased to enable particular areas of the site to be brought forward for development. Some mitigation works may need to be in place before development can commence. This requires the development of IAMP to come forward in a planned and controlled manner, hence the requirement for a phasing plan that incorporates the mitigation proposals. The modification proposed in respect of phasing provides clarity that this would apply for any consenting approach, not solely a Development Consent Order.

The need for a Management Strategy responds to the requirement for the whole site to be operated and maintained to a high standard and to ensure the continued presence of complimentary service facilities. IAMP is targeted at national and international businesses that will expect the high quality design standards, security and infrastructure measures to remain throughout the lifetime of the project, and will require services such as public transport and hospitality/amenity uses to be provided to support their businesses and their staff. The Management Strategy will also set out the requirements to maintain the environmental mitigation area and the publicly accessible locations in accordance with the standards agreed with the regulatory bodies.

To ensure that the approach set out in Del1 is sound and achievable, the local authorities have included the need to deliver the long term management of the site and the mitigation areas as part of the current OJEU Competitive Dialogue process. This is progressing towards the selection of a development partner to deliver and manage the IAMP scheme and a key requirement of that process will be to ensure that the management proposals are in accordance with AAP policy and Del1 in particular.

The modifications proposed are not necessary to make the plan sound but do provide flexibility in the event of alternative consenting approaches. The changes also reflect the proposed modifications to Policy S1.

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

Councils' response;

The IAMP AAP is to provide the policy framework against which development proposals can be assessed. It is not appropriate for the AAP to provide guidance on land assembly. Should the promoter of IAMP require powers of compulsory acquisition, these will need to be applied for and justified in accordance with the relevant planning legislation and Government guidance.

8.3 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?

Councils' response;

Policy Del2, and the proposed modifications, have been drafted to ensure that the consenting approach adopted to implement the IAMP scheme has full regard to the need to deliver and maintain the necessary mitigation works. The approach of using articles and requirements within a DCO consenting route, or planning conditions within an alternative route, or legal obligations in either case, will ensure that the scheme brought forward for consent complies with the infrastructure and environmental policies within the AAP. The DCO articles and/or requirements, or conditions and/or the use of Planning Obligations are a robust method of ensuring that development is delivered in accordance with policy and is enforceable.

The proposed modifications are not necessarily required for the plan to be sound, but provide consistency with Policy S1 (as proposed).

8.4 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?

Councils' response;

The National Planning Policy Framework (NPPF) requires the Councils to plan for and, where possible, help deliver the necessary infrastructure to support new development. The Infrastructure Delivery Plan (IDP) (PSD21) has been prepared to set out the infrastructure requirements at this time. The Councils propose to delete the delivery schedule and include in a separate IDP document (PSD21). The Councils consider that the IDP is a living document, which will be monitored and revised if necessary. It is not necessary to delete and separate the schedule to make the plan sound, but this approach will ensure flexibility and the longevity of the Plan.

8.5 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?

Councils' response;

The viable implementation of IAMP has been a key consideration during the preparation of the AAP. The necessary standards and requirements in relation to the highways, service infrastructure and environmental mitigation measures have been taken into account in the detail that has been used to develop the AAP and IDP.

The IAMP has been costed at £92m, including highways, utility costs, land acquisition and environmental works. The Councils have been successful in securing £42m for the IAMP project through the recent Local Growth Fund announcement for the North East; the Councils have committed £22m through their own resources which has been approved by both Councils Cabinets; and a further £22m is identified to support the delivery of the IAMP Enterprise Zone as advance investment against future Business Rates. A further £5m was secured through the Sunderland City Deal in 2013 which is supporting the project development costs.

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

Councils' response;

The Councils consider that the Policies Map is justified. As required by the Planning Regulation 2012, the Council have prepared a policies map to reflect the location of the policy allocation/designation.

The policies map;

- Allocates 100 hectares as Employment Areas. This is to meet the identified needs identified in the Sunderland and South Tyneside Strategic Employment Study (August 2013) (SD28) and set out in the Commercial and Employment Technical Background Report February 2017 (PSD11) – Section 3.10 page 41.
- In accordance with paragraph 85 of the NPPF, identifies safeguarded land to meet the longer term development needs for IAMP beyond the plan period. This safeguarded land is not allocated for development and will only be realised for development when the Plan is reviewed.
- Amends the Green Belt boundary. As set out in Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) and the Statement of Compliance (PSD10a), the Councils in accordance with paragraph 85 of the NPPF, have defined the boundaries on the policies map using physical features that are readily recognised and considered to be permanent. Pylons which run north-east to south-west across the site have been used, but the Council consider that these and are a recognisable, permanent, physical feature as the pylons would be a significant cost to relocate and National Grid require a 'stand off' distance between the pylons and development. Extending development beyond the pylons would lead to isolated plots and additional land take from the Green Belt, which was considered inappropriate.
- Allocates the Hub as identified in Policy S5. As set out in Section 3.2.5 (page 29) of Statement of Compliance, the 'Hub' is located to the southern part of the site to ensure that it would be of benefit to existing employees at Nissan and their supply chain businesses, creating an early customer base and to foster integration between existing and new businesses. This is consistent with Paragraph 37 which states that Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
- Identifies where the A19 improvements required by policy T1 will occur.
- Identifies the proposed key routes and minor roads T2.
- Identifies the location of the landscape buffer along the A19 required by policy EN1. As justified in the Landscape Technical Background Report (PSD17), Section 4.2 Page 20, the landscape buffer would act as a buffer, soften views and be in keeping with the landscape.
- Includes a reference to listed buildings as protected by Policy D1. The inclusion of listed buildings on the map enhances the protection of heritage assets in accordance with the NPPF.
- Demonstrates how the local road network has been incorporated into the AAP by demonstrating the A19 buffer allowed for future improvements to this section of road network.
- Identifies land required for ecological and landscape mitigation. This 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, this is in accordance with DEFRA developed metric.

The proposed modifications clarify;

- The Green Belt boundary.
- The ecological and land mitigation area is indicative.
- The location of listed buildings in accordance with the NPPF.
- That there are two separate Employment Areas; Northern and Southern.

The Councils propose a further amendment to clarify that that Key Roads and Minor Roads are not a policy designation.

Furthermore, a modification is proposed to Policy D1 as set out on page 14, in order to identify the North East Land Sea and Air Museum (NELSAM) on the proposals map.