

**EXAMINATION OF THE INTERNATIONAL ADVANCED
MANUFACTURING PARK (IAMP) AREA ACTION PLAN (AAP)**

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

Statement made on behalf of W Gordon Proud Trust et al (“the interested parties”)

QUESTION 8.1: Are the requirements of policy Del1, in respect of a phasing strategy, mitigation strategy and a management strategy, soundly based? Are modifications to the policy proposed by the Council’s (Docs PSD6/PSD7) necessary for the plan to be sound?

In principle, the interested parties consider a phasing strategy, mitigation strategy and management strategy are all necessary to inform the implementation of the IAMP as a whole whether the documents are submitted with the DCO application or with any application for the proposed development, in order for infrastructure to be put in place which then allows development to come forward at the earliest opportunity.

A Draft Masterplan was issued for comment as part of the DCO Pre-application Consultation Process but this did not include a phasing strategy and it was not made clear within any of the consultation documents whether such a plan would be provided.

In representations made to the DCO Pre-application Consultation Process provided at Appendix 1 of this statement, the interested parties stated the Phasing Plan should also be accompanied by an Infrastructure Delivery Plan, which identifies the required infrastructure both to support the overall IAMP development and mitigate its impacts. The Phasing and Infrastructure Delivery Plans should all be capable of being read together to identify the trigger points during the build-out of IAMP at which certain infrastructure (supporting and mitigating) is to be delivered in a proportionate manner to that phase of development as well as to facilitate future phases, where necessary. Each document will inform the other. The rate and spatial order of build-out across the IAMP site will determine the effective delivery of infrastructure. It is important to avoid unnecessary infrastructure burdens on any phases of development and particularly any early phases.

The modifications to policy Del1 proposed by the Councils (Docs PSD6/PSD7) are necessary to enable development to be delivered at the earliest opportunity via ‘any application for the proposed development’.

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

The plan notes that land in the IAMP AAP boundary is owned by a relatively small number of parties, many of whom own large areas. It is stated, as a last resort, compulsory acquisition powers may be

included in the DCO for land assembly, however, the interested parties consider exercising use of the powers will be detrimental to the delivery of the IAMP and potentially put the project at risk.

We understand that Nissan are looking for suppliers to be operational by mid-2019 to ensure that they can feed into the manufacturing of the two new vehicles at the site as recently announced. At this stage, we understand that IAMP LLP do not have an interest in any of the significant land ownerships covered by the IAMP proposals. We understand the DCO process is anticipated to take another 18 months before the order is approved (if approved) i.e. mid-2018. Then a Compulsory Purchase Order of the various land interests would have to commence (unless land purchase is negotiated) and this process could take up to 1 or 2 years by which time the mid-2019 deadline would be missed.

Importantly, implementation of the IAMP is about delivery of new development and not necessarily land assembly. IAMP LLP can work with land owners to agree the mechanism for delivery perhaps through separate or advanced early planning applications within the site without prejudicing the comprehensive development of the IAMP site as a whole.

QUESTION 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?

The representations made by the interested parties have consistently focussed on delivery of development within the IAMP at the earliest opportunity being the crucial matter, with the policies of the AAP and the DCO needing to be sufficiently flexible not to put the project at risk.

The evidence prepared reflects the scale of the development proposed. We consider the cumulative impact of national and local policy requirements would not put implementation of the AAP at serious risk as long as there is flexibility within the plan to respond to changes through the build out period and in the economic cycle. This will include viability and it is noted the indicative cost of Development plot infrastructure (associated with the construction of floorspace and internal site roads within the development plots, such as plot drainage, landscaping, estate roads and the buildings) at item 6. in PSD21 (Infrastructure Delivery Plan) is £300m to £400m – this being the most significant cost associated with delivery of the IAMP.

Paragraph 173 of the National Planning Policy Framework states careful attention to viability and costs in plan-making and decision-taking is required. Any S106 Obligations sought to secure developer contribution monies to help fund necessary infrastructure and environmental mitigation works should not be of a scale to threaten delivery of the development. Until a phasing plan is prepared which includes the infrastructure necessary to deliver each phase, a full assessment of any S106 obligations cannot be made and therefore the viability of the phase of development is not known.