



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

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

The Town End Farm Partnership are an “interested party” for the purposes of the EiP. They are uniquely qualified to answer questions in relation to the wider IAMP proposals as part of the AAP Examination as they are major freeholders of a significant part of the IAMP with the benefit of a live hybrid planning application supported by robust assessment forming the Environmental Statement and validation documents.

We respond to each question using the Inspectors references;

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?

A phasing strategy, mitigation strategy and management strategy are all necessary to inform the implementation of the IAMP. Whether the documents are submitted with the DCO application or with any application (including TEFPP live applications) 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 (PSD7 Appendix A Policies Map) but this did not include a phasing strategy and it is not clear whether such a plan will be provided. 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?

NMUK have announced the production of two new models from their Sunderland base which require the supply chain, specifically Tier 1 Suppliers to be operational and supplying Nissan by early-2019 (for clarity this means post construction on site manufacturing, NOT the delivery of land parcels) to ensure that they can feed into the manufacturing of the two new vehicles. What this means from a development perspective is that a suitable planning permission is required for certain suppliers to be approved by mid-2017 to allow a 12 month build out programme and then allow for test runs of the new components. A detailed timeline has been prepared which will be presented on the day to the Inspector which highlights the concerns over a timely delivery via the DCO procedure. A version of the chart is appended for reference.

A significant element of the AAP land is within the ownership/ control of a small number of people. The council are engaging with land owners to acquire the land without the requirement to use its CPO powers. TEFPP understands that the joint authorities have struggled to acquire land by



negotiation and will have to show delivery as part of the DCO application using CPO powers. It is understood that the DCO process will take a minimum of 12 months, more likely 18 months before the Order is approved mid-2018. At the same time a Compulsory Purchase Order Hearing of the various land interests will take place as part of the DCO process (NSiP Regulations), this process can become protracted however it is likely to end at the land tribunal. What we can show via our Gantt chart is a lack of delivery within the timescales envisaged by NMUK.

The inter-relationship of the above-noted processes, consultation documents and planning strategies is complex and, whilst the DCO process is being advanced, our representations to the AAP address our fundamental concerns about the joint authorities ability to deliver the plan, the viability of the IAMP proposals and timing for delivery. TEFP are confident that they can deliver the IAMP scheme and, together with one other significant land owner could deliver the entire IAMP proposal will nil cost to the public purse. The following is consider true of TEFP live application;

- i) TEFP's live planning application is deliverable without undermining the DCO process and is consistent with the aspirations for the wider IAMP scheme.
- ii) The current proposals to use the DCO process to deliver IAMP are unsound.
- iii) The Draft Masterplan is not sufficiently detailed or considered for a AAP and DCO submission and fails to considered market requirements, cost benefit analysis and environmental impact (amongst other considerations).
- iv) The proposed hub does not reflect a market requirement for locational purposes and is not sustainable in terms of the IAMP proposal.

There has been a lack of engagement with community with regard to the predicted impact of the IAMP scheme. We shall show this deficiency manifests throughout the AAP process.

There is insufficient information within the AAP consultation material to allow a robust assessment of a number of significant issues. For example:

- There is insufficient information about highways impacts, capacity and justification for mitigation.
- There is insufficient information about the impact on habitats.
- There is a lack of robust information about the likelihood and timing of the IAMP scheme obtaining funding.
- There is no information regarding land acquisition and deliverability.
- There is insufficient information about the relationship between the NSiP boundary, DCO submission and Area Action Plan, which do not align.
- There are a number of significant unknowns within the AAP consultation materials, including reference to a proposed energy centre, confusion over the retention of the North-East Land,



Sea and Air Museum in conflict with the Area Action Plan, and the size and quantum of industrial units required by the market.

- There is a lack of detail regarding size of proposed units and flexibility for disaggregation/delivery options.

For these reasons we consider the plan is not sound and should be cancelled until sufficient evidence base is presented which robustly assess the impacts and deliver appropriate mitigation.

QUESTION 8.6: Is the policies map justified? Are the alterations to the map proposed by the councils (Appendix A of PSD7) necessary for it to be justified?

Policy T2 encourages walking, cycling and horse riding with the aspiration being for the IAMP to be an attractive sustainable environment seeking to create and encourage pedestrian movement. The location of the Hub as identified within the (August 2016) Publication Draft to the southern boundary of the site clearly conflicted with the Policy T2. The proposed re-balance of introducing ancillary uses in the northern area compounds the problem further. The justification given by PSD9 points to a critical mass argument advanced by PSD13, which explains the quantum of footfall potentially generated due to the proximity of Nissan. The lack of understanding of Nissan from a “people” perspective undermines the soundness of the evidence base. We have previously explained the shift patterns and break times in Matter 3 discussions.

The Hub would be the key transport interchange as well as providing support facilities for the wider IAMP, due to these facilities being located at such a great distance 1.5 km it discourages walking and encourages the use of private modes of travel, which adds to the recirculation of traffic throughout the site adding to travel times, noise and emissions, all of which detract from the attractiveness of the IAMP as an investment.

We previously objected to the position of the Hub as envisaged within the draft AAP and the now submission draft (PSD7). The logical location for the Hub is to have it centrally located. The position of the hub which was previously promoted in an early consultation document (International Advanced Manufacturing Park – Green Belt and Site Selection Options 2015) was as follows and is the logical location;



**The dashed line denotes the proposed relocated hub**

The centralisation of the Hub will ensure that the transport nodes are logical to users and truly central to all future users of the wider IAMP. The central location will ensure that no part of the Hub is more than 750 metres from commuters.

TEFP has engaged with SCC and latterly STC with regard to phase 1 IAMP (of which TEF is the freehold owner) for the past nine years. On 1 December 2015, there was a disengagement of TEF from the Masterplan process and the appended timeline provides clarity on subsequent discussions and the necessity for TEF to submit a hybrid planning application to secure consent for a Tier 1 supplier on their own land.

TEFP is concerned that the Masterplan fails to respond to the Scoping Opinion of the Secretary of State, significantly differs from the Area Action Plan, and that IAMP LLP has failed to present a justification / evidence for the Masterplan layout.

It is submitted that the current DCO proposals are not justified and that IAMP LLP has not considered positively alternative options which reduce or eliminate impacts and can be delivered in a timely manner. It is also submitted that IAMP LLP has not undertaken the necessary cost benefit analysis of the road infrastructure proposals for a bridge over the A19.

Moreover, the funding to deliver the Masterplan is not considered. It is understood the Secretary of State has requested, as part of the DCO submission, details of funding and deliverability – these details should have been included as part of the pre-application consultation materials to allow a robust assessment of the DCO proposals.



Our Consistent Response to the AAP Masterplan is as follows;

We object to the Masterplan on the basis of the grounds presented below and those already expressed in our formal representation to the IAMP Area Action Plan Publication Draft Consultation (August 2016). The following concerns are reiterated;

- 1 Proposed highway improvements incorporating link road between A19 to connect Washington Road to the A1290

There has been insufficient justification for this bridge presented by SCC / STC / IAMP LLP either in the public domain or as part of discussions regarding the TEFP live planning application. The proposed bridge from Washington Road opposite Town End Farm Estate arrives within TEFP's freehold ownership and SCC / IAMP LLP asserts that it will provide "relief to the Local Road Network".

We were made aware of the inclusion of this bridge 7 weeks into the determination of TEFP's live planning application. The AAP was amended from the initial draft to include the road bridge in November 2017, with the stated changes in the AAP modifications document dated November 2016 described as "re-alignment of some of the proposed key internal roads".

Repeated requests to SCC / IAMP LLP for assessment of the requirement for this bridge and indeed a conversation with regard to the cost benefit analysis have been declined.

We object to the Draft AAP Masterplan and consider it unsound for the following reasons in summary:

- 1 The proposed Hub is sequentially less preferable to the location proposed within the live TEFP application. The location proposed by the TEFP application is central and is easily accessible and visible from the A19, which is essential to attract and signpost the IAMP to national and international investment.
- 2 The proposed Hub would be visually and functionally detached from the wider IAMP site. In contrast, the TEFP location is 750m distant from all of the proposed employment development and retains a suitable distance from all parts of the development, including the existing NMUK complex.
- 3 The clear benefits of a centrally located Hub led the earlier iterations of the draft Area Action Plan. There is no reasoned justification or evidence for the relocated Hub point and, in fact, this does not represent a sustainable location for the IAMP DCO proposals. Representations to the Planning Inspectorate will refer to our previously appended reports from WSP and Shandwick Commercial Surveyors which support this position.



## **Appendix 1**

**Gantt Chart for the Delivery of Development (TEFP Live Application, IAMP LLP  
DCO and HE Downhill Lane Improvement work)**

HEARING STATEMENT  
TOWN END FARM PARTNERSHIP (TEFP)  
MATTER 8



Ryder

Wear Point 55

Wear Point 55 Design Programme

Revision 2

20/12/2016

