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Dear Sirs

**International Advanced Manufacturing Park – Green Belt and Site Selection Options  
Response on Behalf of The Town End Farm Partnership**

On behalf of my client, The Town End Farm Partnership, we have now had an opportunity to review the Green Belt and Site Selection Options paper and, following a subsequent landowners meeting on 16 December 2015, wish to raise the following points in relation to the various options identified in your submitted report.

For the avoidance of doubt, option number 1 is my client's preferred option, given the strong commercial identity achieved by the frontage along the A19 corridor and the ongoing synergy of this land release with the various elements identified in promoting a successful IAMP scheme. Below we set out the compelling reasons why my clients land should form phase 1 of any development strategy for the wider IAMP scheme. The justification for our reasoning is established within the principle document (GB Review and Site Selection), from our investigations and from extensive market knowledge.

Site selection is informed by a multitude of issues including the physical capability of the land to yield development (Quantum) the costs of delivery, physical constraints placed upon development, the availability of the land and market requirements. The site selection paper is, in our opinion, not sufficiently multifaceted given the complexity of the planning position. We do acknowledge that, understandably so, without removing the land from Green Belt in the first instance there is no future potential. In exercising caution my client is aware that the process is complicated and has provided ongoing support to the process of ensuring the land is removed from GB and allocated for an employment related use. However we have been clear from the outset that the site selection process needs to ensure that commercial reality is also a determining factor in selecting the correct location. Below we summarise the key points from your study which support the inclusion of my clients land in the first instance. Then we apply these positives to the 3 options advanced. We pay particular attention to the importance of the PricewaterhouseCooper report in terms of commercial justification and market signals.

**The Town End Farm Partnership Site – High Level Green Belt and Site Selection Review**

Using the conclusions of each section of the Site Selection Options paper, the following is true of my client's land.

i) Demand for IAMP

Section 5.2 of your report makes a very strong case for future requirements for the IAMP scheme. PricewaterhouseCoopers (Herein referred "PwC") assessed future trends across high growth industries across the North East, specifically focusing on the automotive, advanced manufacturing/engineering sectors, given the development scenarios to forecast potential floor space demand up to 2033 a "moderate view" as advanced in August 2013. This analysis informed the joint City Deal bid which required 100 ha and potentially 5,200 jobs with a requirement for potential longer term expansion up to 150 ha. There are, therefore, significant land release requirements in this area, specifically linked with market opportunities including Nissan expansions and the requirement for new models including the luxury Infinity marque and Juke model planned for 2017. The fact that £0.6 billion worth of components are from outside the North East every year, it is of course attractive to allow such companies to locate in the North East.

A brief review of development enquiries for manufacturing and distribution uses (not necessarily linked just to Nissan) identifies a demand (direct from SCC and STC) for large floorplate developments over 2,000 sq m on sites of 1 ha or more, amounting to a total property requirement of 152,500 sq m with a total land requirement of 171 ha.

There are clear requirements for the IAMP proposals and for significant releases. The question then arises as to where these should be located within the overall red line boundary and, in this regard, three options are presented by the IAMP team.

We note the Sunderland City Deal in March 2014 confirmed that size, proximity to existing industry, transport links and availability are factors for consideration as part of the options.

The Town End Farm Partnership land is of course immediately adjacent to not only Nissan with the potential for immediate links, but also is the closest parcel of land to the A19 and its obvious benefits.

We note that adjacency to Nissan and the A19 corridor is seen within the PwC report as the optimal location to capture growth opportunities and, in this regard, our client's land is the most advantageously located.

With regard to transport link, PwC report also concluded that the accessibility of a skilled workforce is essential to the success of the site, as well as proximity to the strategic road network, rail and port. In all regards, the subject land outperforms the other parcels of land identified in the various options. The subject land is accessible on foot via an existing foot bridge from the south eastern corner of the site directly into Hylton Castle and Town End Farm Estates making it in locational terms, highly sustainable given its accessibility on foot, bicycle and by means other than the car.

The Strategic Employment Study in August 2013 stated that *"many of the manufacturing companies likely to locate to the site will produce goods mainly for the international market. Consequently they will require good road and rail access in order to distribute their goods. They will also require links to the local port and national rail network"*. The Town End Farm Partnership land has exceptional links to the A19 and is highly visible, giving an added advantage in locational terms. There are no issues in delivering the site and it can be delivered immediately without any prior investment in infrastructure. It is also not constrained by a requirement to provide a road access over a river and can be accommodated now without major infrastructure investment.

For clarity, the site is currently available, suitable and deliverable for this land use, subject to removal from the Green Belt as part of this wider project. There are no restrictions on title and there is a willing developer able to deliver the scheme.

## (2) Green Belt Analysis

The Report conclusions in relation to land parcel N119 (my clients land) focus upon the five main reasons for including land within Green Belt, as envisaged by NPPF paragraph 79.

In conclusion, the subject site performs well and comes out with a score which identifies the site as “C” – moderate impact, which can be mitigated. It is noted the majority of land central to the larger red line area falls under classification D: moderate overall adverse impact with some mitigation feasible.

It is material that the only parcel of land which falls under assessment C in close proximity to the A19 Downhill Lane junction is the subject site.

## (3) Technical Review

Within section 7 of the Green Belt and Site Selection Options paper, technical issues are considered. With direct regard to the subject site, the provision of the upgraded junctions from Highways England of the A19 Testos Roundabout and Downhill Lane junction will only strengthen this site’s linkages to the wider national and international market.

With regard to threats, it is stated that the timing of the delivery of the A19 improvements may restrict the amount of development which can come forward at IAMP in the short to medium term. Discussions have been ongoing that The Town End Farm Partnership land can come forward within the capacity of the existing highway network and would not be significantly delayed by the Highways England proposals.

With regard to utilities and infrastructure, it is understood flooding is a potential issue with regard to the western and northern areas of the wider site which are classified in Flood Zones 2 and 3, especially around the River Don. Whilst the report states that it would not significantly impact the development location, it must be recognised that development in close proximity to the River Don will need to be mindful of the potential risk of flooding. It is also worth noting there is no flood risk from either surface water flooding or fluvial flooding for The Town End Farm Partnership land. A number of high voltage overhead power cables are identified as traversing the wider site, which require 30 m clearance as a worst case scenario. It is noteworthy there are no such utilities or infrastructure weaknesses associated with The Town End Farm Partnership land which could represent a constraint in the designing of the final land use distribution which would create a significant disruption or lead to undevelopable zones.

## Environment and Ecology

It is understood a significant proportion of ecological impact will take place on land in and around the River Don which include water voles, otters, badgers, Great Crested Newts (“GCN”), barn owls and having an ecological value for wintering birds.

Following an extended Phase 1 Habitat Survey and GCN Risk Assessment prepared by Eco North for the subject land, there was no evidence of protected species found within the proposed area of works. The habitat comprises an arable field with bordering hedgerow and narrow margins (1 m at best) of coarse grassland and tall ruderal vegetation of low ecological value. The Town End Farm Partnership landholding contains a network of ditches which were found to have a below average suitability index score for GCN’s. The GCN Risk Assessment concluded that GCN populations are unlikely to be present within the proposed works area. This was mainly due to the poor quality of the ditches and suitability of the terrestrial habitat. So, whilst the wider site has a high number of ecological constraints, it is clear the subject site can be

delivered immediately with very limited attention to mitigation, given the low levels of impact to known ecology.

### Flood Risk

A known risk is flooding from the River Don and, as such the South Tyneside Strategic Flood Risk Assessment identifies potential increases in surface water discharge. A weakness of the wider scheme is the need to build a resilient infrastructure against the potential of flooding. Furthermore, it is known that South Tyneside's sewerage network is at or close to capacity and increasing development will put pressure on this. It is understood that significant SuDS will need to be incorporated as part of delivering the wider scheme.

As the River Don and its tributaries have been known to flood, the GB Review informs that some areas are designated Flood Zones 3B and some are Flood Zone 2. A detailed flood risk mitigation shall, therefore, be required on certain parcels of land identified in the options report. The issue of locating significant numbers of people, specifically within the hub area in close proximity to the areas of flood risk, creates a significant threat for development and should be avoided.

The Town End Farm Partnership land has not flooded and is not susceptible to fluvial or surface water flooding. There will be requirements for sustainable urban drainage which will need to be considered and factored into any future development.

### (4) Planning Policy

As stated within the emerging Sunderland City Council Local Plan (consisting of Core Strategy and an Allocations Plan) Policy CS3.4 demonstrates demand and seeks to deliver a 20 ha site to the north of Nissan which specifically identifies at paragraphs 3.17 and 3.18 The Town End Farm Partnership land.

With regard to South Tyneside's Local Plan and Core Strategy, Policy EA5 : Environmental Protection states that it does not permit the development of unsustainable schemes located in those areas of the Don Valley where flood risk is unacceptably high. At present this is the case for some of the suggested land take and would entail significant mitigation and cost.

### Site Selection Options

The Council have assessed three potential sites, which include circa 170 ha of development with a potential 70 ha of safeguarded land. Each plan has a landscape and ecological mitigation zone of circa 50 ha on either side of the River Don for its protection and each proposes a hub to include transport, workspace, conference facilities, retail and cafes and possibly a hotel. We are informed the proposals have been drawn outside of the Flood Zones and not within 50 m of any water courses. Furthermore, we are informed each parcel of land has been drawn outside of Significant Ecological Constraint Areas.

#### Option 1 : A19 Corridor

This site includes The Town End Farm Partnership land and extends to circa 100 ha. This is the preferred layout for our client which encompasses the Highways England improvements at Downhill Lane junction, and a visual presence along the A19.

Our client is of the opinion that Option 1 is the most advantageous (Including the reasons identified above) and as;

- It maximises the potential land values (Due to visual presence along the A19 and use of existing infrastructure); and

- At least the first phase could be delivered in the shortest timeframe (The Town End Farm Partnership's land is within single ownership of a willing developer and with no barriers to development (i.e. vacant possession can be obtained immediately and there is no requirement to relocate utilities, upgrade infrastructure, obtain third part consents etc).

However we cannot support this option in totality given that the proposed hub, centered on South Tyneside land just off the River Don, whilst providing a pleasant backdrop, it would provide a significant risk next to the River Don. The land use proposals within a hub are likely to generate demand for high volumes of people into an area if risk in close proximity to a Flood Zone which should not be supported in its current form. The proposed hub should be extended to include the Town End Farm Partnership land as detailed within the extract plan below. It is understood the hub could potentially, in its proposed location, include a transport interchange, given its credentials for access to the remainder of the site. In summary, this option is supported by our client, however, the location of certain uses within the hub should not be located at this point, and rather they should be relocated within the extended area envisaged below. It is essential in our opinion to have an education/ training college within phase 1 and to provide service uses (such as retailing outlets) in an accessible central position (including access for Nissan staff within easy walking distance). We see our site as phase 1 of the IAMP proposals given the immediate availability of the land, in single ownership and not subject to any constraints that would withhold development.



#### Option 2 : North West to South East Axis

This incorporates 170 ha of land, of which 100 ha is for development and 70 ha safeguarded. This site specifically excludes The Town End Farm Partnership land from development, but safeguards it for the latter stages of the Development Plan in the event that should further land be required. This site is not supported in any way and is considered to have a more detrimental impact on ecology, flood risk and specifically Green Belt, given the extension north and westwards into a more exposed Green Belt location. This option would also not have any A19 road frontage and does not provide direct access to the highway network. The concentration of the site into a more central area means a greater reliance upon an access road from Washington Highway into the Green Belt.

#### Option 3 : East to West Axis

Although this option includes The Town End Farm Partnership land it is considered that it does not capitalise upon the site's linkages to the A19 and the wider national and international markets. To safeguard land to the west and north is a missed opportunity, but does avoid the greatest Green Belt impact on a highly sensitive ecological areas.

On behalf of my client I submit the above reasoning and justification to endorse Option 1 in accordance with our reasoning and amendments identified within this submission. We confirm that options 2 and 3 cannot be supported in any form and we would seek to vigorously resist such proposals should the merge as preferred options.

Please acknowledge receipt of this submission in writing.

Yours faithfully

A handwritten signature in black ink, reading "Sean Hedley". The signature is written in a cursive style with a large, sweeping initial 'S'.

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