

Consultation on the Publication Draft International Advanced Manufacturing Park Area Action Plan

Background

1. South Tyneside Council and Sunderland City Council are consulting on the Publication Draft Area Action Plan (AAP) for an International Advanced Manufacturing Park (IAMP). The IAMP is proposed to be located to the east of Follingsby Park along the A19/A184 corridor, on land that is currently designated as Green Belt. Proposals indicate it will provide 100 hectares of allocated employment land, with a further 50 hectares of safeguarded land, which could be released in the future to accommodate further growth. The IAMP aims to accommodate growth in the advanced manufacturing sectors related to automotive production and low carbon technology.
2. The current consultation is an opportunity for the Council to view and comment upon the draft policies that will be used by South Tyneside Council and Sunderland City Council to guide development of the IAMP. This consultation builds upon previous engagement with residents and stakeholders, the most recent public consultation being the February 2016 consultation on Green Belt site selection options.
3. Development of the IAMP will be supported through the preparation of a Development Consent Order (DCO), which South Tyneside Council and Sunderland City Council intend to submit in 2017. The AAP, subject to approval, will remove land at the IAMP from the Green Belt. The subsequent DCO will effectively provide outline planning consent for the project. A DCO is required as the IAMP has been designated a Nationally Significant Infrastructure Project.
4. The draft AAP addresses a wide range of policy areas. Given the close proximity of the IAMP to a number of Gateshead's existing employment areas, and the scale of the proposed development, our draft response provides detailed recommendations relating to a number of emerging policies. The level of detail provided in our draft response is also a result of this being the first opportunity to view and comment upon the specific policies that will guide development at the IAMP.
5. The deadline for the consultation response is 26th September 2016. In order to meet this deadline, our comments have been forwarded to South Tyneside Council and Sunderland City Council for information,

with an accompanying covering letter stating that our formal consultation response is subject to Cabinet approval on 11th October 2016.

Implications of Recommended Option

6. **Resources:**
 - a) **Financial Implications** – No financial implications directly arise from this report
 - b) **Human Resources Implications** – No human resources implications.
 - c) **Property Implications** - No property implications.
7. **Risk Management Implication** - No risks associated with the consultation.
8. **Equality and Diversity Implications** – No equality and diversity implications
9. **Crime and Disorder Implications** – No crime implications.
10. **Health Implications** – No health implications.
11. **Sustainability Implications** - A Sustainability Appraisal and Strategic Environmental Assessment will be carried out on the proposals as they are developed.
12. **Human Rights Implications** - No human rights implications.
13. **Area and Ward Implications** – The proposed IAMP could potentially have implications, predominantly in the east of Gateshead, although close cooperation between Councils and adhering to the duty to co-operate should resolve any issues.

Annex

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Thank you for providing us with the opportunity to comment on the publication draft Area Action Plan (AAP) for the International Advanced Manufacturing Park (IAMP). An IAMP has potential to be of national significance in terms of its economic impact, and could play a major role in the development of the North East economy over the next decade and beyond. In recognition of the potential wide-ranging implications of this project, and the requirement for local authorities to work together on cross-boundary issues under the duty to cooperate, Gateshead Council wishes to submit a response to consultation on the publication draft IAMP AAP. As consultation on the publication draft AAP is a formal stage of the plan preparation process, this letter is provided in addition to relevant representation forms, which are enclosed with this letter.

Successful implementation of the IAMP project, through delivery of development which meets the vision and objectives for the IAMP, will make a positive contribution to economic growth in Sunderland and South Tyneside, and the wider region. Policies of the emerging IAMP AAP will be the primary means by which Sunderland and South Tyneside Councils can guide and support the successful and sustainable delivery of the IAMP. The scale and location of the IAMP means that it has potential to have a significant impact on economic development within Gateshead. The successful application of robust policies relating to the IAMP will therefore make a positive contribution to economic growth within our area. Through reviewing the publication draft AAP, we have identified a number of areas where we consider some improvements could be made to policy wording to enable the AAP to be more effective.

This formal stage of consultation on the AAP requires a consultation form to be completed setting out suggested changes to specific policies or paragraphs, and seeks that consultees indicate whether they consider the AAP to be sound and legally compliant on this basis. The restrictions of the consultation response form (requiring respondents to indicate they either consider a policy or paragraph to be 'sound' as written, or whether they consider some changes are required, and the policy or paragraph is therefore 'unsound') mean that, for our suggested amendments to policies to be regarded appropriately through the consultation process and subsequent examination of the AAP, we have needed to indicate that we consider a number of policies to be 'unsound'.

The IAMP has potential to have implications for Gateshead's economic growth, and this consultation is the first opportunity we have had to consider the Councils' draft policies for an AAP. Through this consultation response we would like to recommend a number of revisions to the proposed policies which we consider could improve their effectiveness, particularly in relation to the potential impacts on Gateshead. However, we would like to make clear that, as noted in our previous responses to consultation on emerging

proposals for the IAMP, Gateshead Council is supportive of this project, and we regard the overarching vision and broad policy approach to development at the IAMP to be appropriate. We consider that when taken as a whole, our suggested amendments to the draft IAMP AAP policies amount to relatively minor modifications which, if taken forward would improve the clarity of the Councils' emerging policy approach to development of an IAMP.

Strategic Policies

Policy S2 sets out the Councils' approach to designating Green Belt and safeguarded land. Criterion B states: "*Areas of safeguarded land shall only be released for development through a review of the AAP, where it can be demonstrated that there is insufficient land within the allocated employment areas to accommodate development needs.*" Although the criterion makes clear that a revision of the IAMP AAP is the only means by which safeguarded land can be released for development, neither the policy nor its supporting text give an indication of how the Councils will determine whether there is sufficient land within the allocated employment areas to accommodate development needs. The monitoring framework provided within Appendix B identifies a contingency measure for monitoring the implementation of this policy (and the trigger for a review of the IAMP AAP), stating: "*If 50% of the land is taken up by year 5, then consider an early review of the AAP to release the safeguarded land*". However, this approach does not appear to provide a clear mechanism for how the capacity of the IAMP will be reviewed after year five of the project's implementation.

The future release of safeguarded land (50ha) at the IAMP could have significant implications for economic development in the wider area, and for Gateshead's policy approach to the provision of employment land. In our view, the policy would benefit from increased clarity regarding which criteria need to be fulfilled before a review of the IAMP AAP would be deemed necessary. Inclusion of some criteria within policy S2 or its supporting text (rather than the current reference within the monitoring framework table) would also aid transparency. In our view, appropriate criteria would establish how future development needs at the IAMP will be determined, and set out how these needs will be considered against the remaining capacity of land within the IAMP.

Policy S2 and the approach to monitoring this policy appear to refer only to an exploration of the demand for, and supply of employment land within the allocated employment areas of the IAMP. Notwithstanding the specific sectors that will be the focus of development at the IAMP, in our view a more effective assessment of the need to release safeguarded land would consider the supply of suitable and deliverable employment land in other nearby locations, including those within Gateshead. Such an approach would be in keeping with the Duty to Cooperate, and would aid in minimising the potential displacement effects of the IAMP project. Considering the supply of employment land in nearby areas will be of particular relevance if development within the IAMP's allocated employment areas contains occupiers operating outside of the automotive and advanced manufacturing sectors.

Land Uses

Policy S3 aims to establish the principal uses that will be located within the IAMP. Supporting text to the policy notes that, in order to protect against potential future changes to permitted development rights, the long term uses of the IAMP for the automotive and advanced manufacturing sectors will be secured through a requirement in the Development Consent Order (DCO). Providing a robust and unambiguous planning framework for the uses that are to be located within the IAMP is likely to be a key factor in its success as a strategically important employment location. Accordingly, we consider that policy S3 should more clearly specify the principal uses that will be considered appropriate within the IAMP. Implementing the IAMP vision will mean the development of the IAMP primarily for B2 and B8 uses, and these Principal Uses should be clearly defined within the AAP policy. Clearly identifying the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses “*as set out in policy S3*”.

Criterion B of policy S3 aims to establish criteria which will be used to assess where development proposals not associated with automotive or advanced manufacturing sectors will be acceptable. For proposals to be considered acceptable, criterion B.iii. requires applicants to demonstrate “*that there are no alternative, suitable locations*” that could accommodate the proposal. The AAP does not indicate the geographic area that should be used in the assessment of alternative, suitable locations. Given the IAMP’s close proximity to Gateshead, and a number of our employment areas, we consider the policy would be more effective if it is made clear that assessments of suitable, alternative locations should include an appraisal of potential development sites in Gateshead.

Policy S4 identifies the mix of uses (in terms of amount of floorspace) that will be accommodated within the IAMP. Although the policy sets the total amount of floorspace for employment (B use class) uses within the IAMP, the policy does not indicate floorspace area(s) of individual units. Supporting text to the policy notes: “*The IAMP AAP will facilitate provision for a range of unit sizes to encourage companies of varying scales to locate on the site. This approach offers the opportunity for business growth within the development to encourage future sustainability*”. We recognise the potential benefits of supporting the development of businesses located within the IAMP, and also acknowledge the need to accommodate a range of unit sizes within the IAMP to cater for the needs of different businesses. However, in our view, it would be appropriate for the majority of the IAMP’s premises to be larger units capable of attracting and accommodating larger occupiers. An approach of focussing on the provision of larger premises, capable of accommodating established businesses would be in keeping with the IAMP’s vision of establishing “*A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries*”, and would also support the objective of attracting “*European-scale ‘super suppliers*”. Provision of a relatively high proportion of larger units would also support the use of the IAMP by businesses operating in the automotive and

advanced manufacturing sectors, reinforcing the Councils' approach of concentrating development within these specific sectors.

Policy S5 aims to establish the Councils' approach to ancillary uses within the IAMP. Ancillary uses will provide an important supporting function within the IAMP; however, if left unchecked, there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, inappropriate development of retail and leisure uses within the IAMP could be detrimental to the project, and could detract from its contribution to economic growth. Accordingly, a clear and succinct policy is required to control the location and quantity of ancillary uses. We consider the current structure of policy S5 results in some ambiguity regarding the appropriate quantity and location of ancillary uses within the IAMP.

Criterion A of policy S5 sets out the type and quantity of ancillary uses that will be acceptable within the whole of the IAMP, and states: "*To support the delivery of a sustainable scheme the following ancillary uses shall be permitted **within the IAMP** [our emphasis] as part of a comprehensive scheme comprised in the IAMP DCO application*". The criterion goes on to specify the total quantity of floorspace that will be permitted for some ancillary uses, including a total of 1,500sq m for retail and leisure uses.

Criterion B specifies that ancillary uses of education, training, leisure and hotel uses shall be accommodated within or next to the Hub. Although supporting text to policy S6 suggests that the Hub will be a key location for retail uses, restaurants and cafés, such uses are not mentioned within criterion B of policy S5.

Criterion D of policy S5 states: "*In addition to the Hub location, small scale retail and leisure provision of up to 1,000sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don*". Criterion D of this policy (unlike criterion A) does not make clear whether the amount of ancillary floorspace specified is the total quantity of floorspace that will be permitted, or the maximum area that will be acceptable for a single unit. Assuming that criterion D sets out the total retail and leisure floorspace that will be acceptable within the northern part of the IAMP, applying this alongside criterion A suggests that there will only be 500sq m of retail and leisure facilities within the Hub location, which does not seem appropriate for its status as the 'focal point' for ancillary facilities.

An unambiguous policy framework guiding the location and quantity of ancillary uses within the IAMP as a whole, and within the Hub location specifically would contribute to a more effective policy, and we respectfully suggest that revisions are made to improve the clarity of policy S5.

Design

Policy D1 provides key design principles that will be used to shape the IAMP. Given the sensitivity of the River Don to nearby development, we suggest that protection and enhancement of the River Don corridor should be a key design

principle for the IAMP, set out within policy D1. Effective water management and provision of landscape and ecology buffers will support this principle, as would a requirement for the proposed bridge crossing to be sensitively designed to minimise its impact on the River Don corridor. A requirement to protect and enhance the River Don Corridor would also be consistent with the policy approach Gateshead Council has taken to development at the South of Follingsby Lane employment site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP).

Highway Infrastructure

Policy T1 relates to the mitigation of the highways impacts of the IAMP. The Councils have published a Transport Technical Background Report to support consultation on the publication draft AAP; however, this report does not provide detail on the transport modelling work that has been undertaken. Through ongoing dialogue, South Tyneside Council and Sunderland City Council have agreed to share this more detailed evidence on transport modelling with Gateshead Council. Once we have received and had the opportunity to review this evidence, we hope to be in a position to advise on whether we consider the approach to mitigating the IAMP's traffic impacts is appropriate, particularly regarding the potential impacts on Gateshead.

Walking, Cycling and Horse Riding

Policy T2 sets out the Councils' emerging policy on non-motorised transport at the IAMP. If sustainable transport options are to be optimised within the IAMP, and within this part of the region, policies should seek to firmly integrate sustainable transport options within developments. The current approach within policy T2, particularly within criterion A.i. and A.ii. places focus on accommodating cycleways and footpaths around planned changes to the highways network, rather than highlighting the importance of establishing a high-quality, integrated sustainable transport network. We would support changes to policy T2 which emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.

Public Transport

Policy T3 sets out the approach that will be taken to promote and facilitate public transport servicing the IAMP. We support the enhancement of bus services to and from the IAMP, and are keen to engage with both Councils to discuss potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.

Flood Risk and Drainage

Policy IN2 includes requirements to provide SuDS features within the IAMP. Criterion C requires that "*...run-off from the site (post development) does not exceed corresponding greenfield rates, minimises pollution and is effectively managed with clear ownership in place*". While we support the principle of this policy, we consider that its requirements regarding pollution should be strengthened, by replacing "minimises" with "prevents". The policy also presents an opportunity to support the multifunctional benefits of SuDS, and

should require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy.

A further opportunity for the IAMP to compliment the development of the South of Follingsby Lane site could be realised if policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead. This approach would support the wider catchment management and ecological connectivity of the River Don.

Ecology

Policy EN2 seeks to establish policies which will protect and enhance the ecological value of the IAMP. As referred to in our comments relating to draft AAP policies D1 and IN2, the River Don corridor provides a valuable shared ecological resource which spans areas of Gateshead, South Tyneside and Sunderland. The mobile nature of protected species also means that development within the IAMP has potential implications for biodiversity within Gateshead. In this respect, Gateshead Council would support a strong policy approach to protecting and enhancing Local Wildlife sites and ecological connectivity through development of an IAMP. We recognise that policies of the AAP will be applied alongside those contained in the Councils' other Local Plan documents. However, we would support revisions to the wording of policy EN2 to provide a more robust policy approach requiring the protection and enhancement of ecological assets through development of the IAMP.

Supporting text to policy EN2 states: "*Priority will be given to mitigating effects [on ecological assets] within the IAMP boundary, however in certain cases it may be necessary to provide offsite mitigation*". In our view it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don corridor is to be protected, and this should be made clear within policy EN2.

Summary

If the potential benefits of an IAMP for Sunderland, South Tyneside, and the wider region are to be delivered, effective cooperation with key stakeholders will be of fundamental importance. Gateshead Council welcomes the opportunity to contribute to the IAMP's success through active participation in this process.