DEVELOPMENT PLAN
Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise.

Unitary Development Plan - current status
The Unitary Development Plan for Sunderland was adopted on 7th September 1998. In the report on each application specific reference will be made to those policies and proposals, which are particularly relevant to the application site and proposal. The UDP also includes a number of city wide and strategic policies and objectives, which when appropriate will be identified. This application is subject to an update to the UDP. IAMP Adopted Area Action Plan 2017

STANDARD CONDITIONS
Sections 91 and 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004 require that any planning application which is granted either full or outline planning permission shall include a condition, which limits its duration.

SITE PLANS
The site plans included in each report are illustrative only.

PUBLICITY/CONSULTATIONS

The reports identify if site notices, press notices and/or neighbour notification have been undertaken. In all cases the consultations and publicity have been carried out in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

LOCAL GOVERNMENT ACT 1972 – ACCESS TO INFORMATION

The background papers material to the reports included on this agenda are:

- The application and supporting reports and information;
- Responses from consultees;
- Representations received;
- Correspondence between the applicant and/or their agent and the Local Planning Authority;
- Correspondence between objectors and the Local Planning Authority;
- Minutes of relevant meetings between interested parties and the Local Planning Authority;
- Reports and advice by specialist consultants employed by the Local Planning Authority;
- Other relevant reports.

Please note that not all of the reports will include background papers in every category and that the background papers will exclude any documents containing exempt or confidential information as defined by the Act.

These reports are held on the relevant application file and are available for inspection during normal office hours at the Economy and Place Directorate at the Customer Service Centre or via the internet at www.sunderland.gov.uk/online-applications/

Peter McIntyre

Executive Director Economy and Place

1. Washington

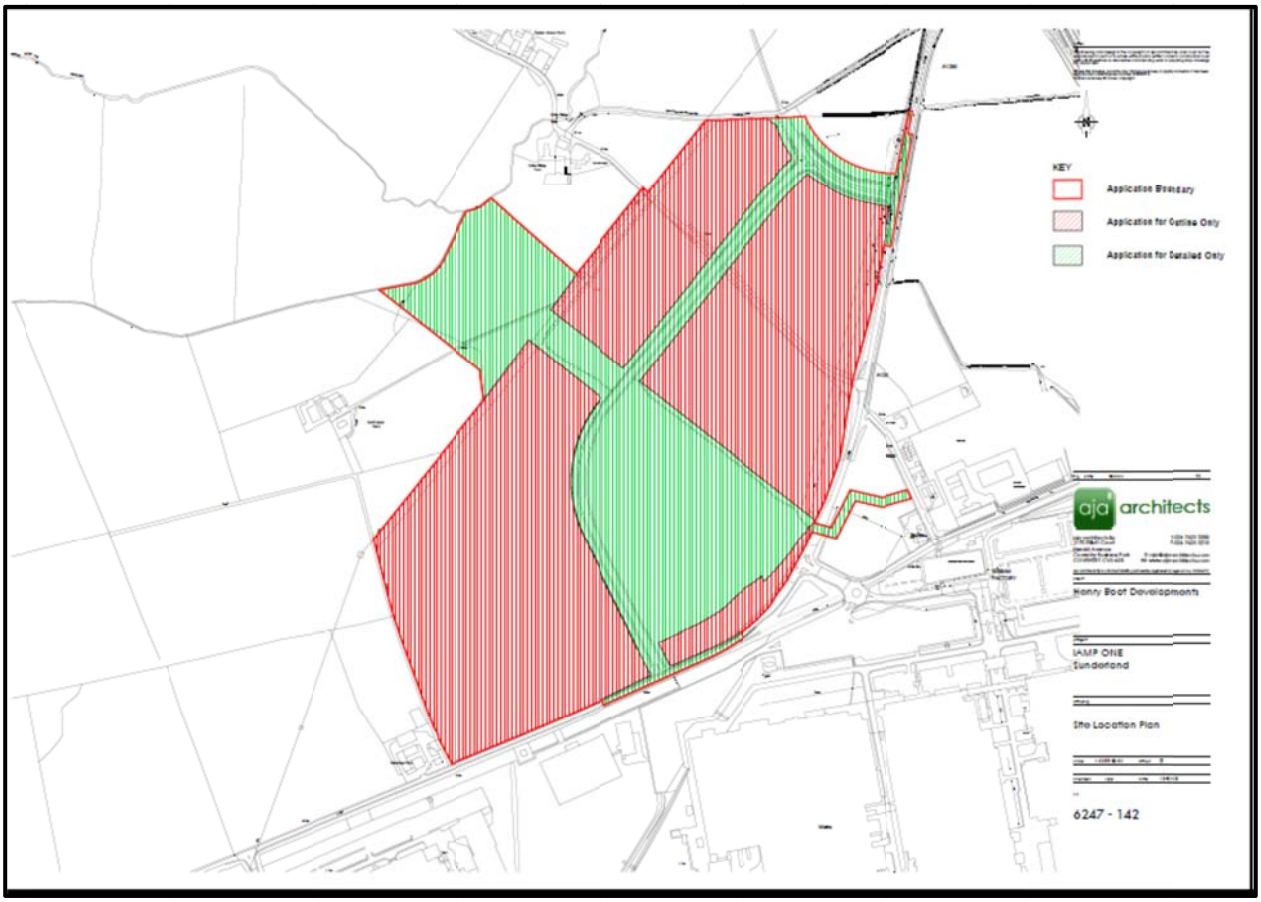
Reference No.: 18/00092/HE4 Hybrid ES and (Reg)4
Proposal:

Hybrid planning application seeking: Full planning permission for one industrial unit on Plot 3 (21,856sqm) (Gross Internal Area (GIA)) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8), with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with associated access, parking, service yards and attenuation basins, as well as the temporary construction route, internal spine road, utility diversions, with two accesses onto the A1290 and associated infrastructure, earth works and landscaping; and

Outline planning permission for the erection of industrial units (134,984sqm) (GIA) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8) with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with internal accesses, parking, service yards, attenuation basins, electricity substations, foul pumping station, realignment of the access road to North Moor Farm and associated infrastructure, earthworks and landscaping. All matters are reserved for determination at a later stage.

Location: Land To The North And West Of The A1290, And North Of Nissan, Washington, Sunderland
Ward: Washington North
Applicant: Henry Boot Developments Ltd
Date Valid: 18 January 2018
Target Date: 10 May 2018

Location Plan



PROPOSAL:

A Hybrid planning application has been submitted seeking: Full planning permission for one industrial unit on Plot 3 (21,856sqm) (Gross Internal Area (GIA)) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8), with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with associated access, parking, service yards and attenuation basins, as well as the temporary construction route, internal spine road, utility diversions, with two accesses onto the A1290 and associated infrastructure, earth works and landscaping; and

Outline planning permission for the erection of industrial units (134,984sqm) (GIA) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8) with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with internal accesses, parking, service yards, attenuation basins, electricity substations, foul pumping station, realignment of the access road to North Moor Farm and associated infrastructure, earthworks and landscaping. All matters are reserved for determination at a later stage.

The IAMP represents a unique opportunity to the automotive and advanced manufacturing sectors in the UK. Located next to the UK's largest and most productive car manufacturing plant at Nissan, the IAMP will provide a bespoke, world class environment for the automotive supply chain and related advanced manufacturers. The IAMP will contribute significantly to the long-term economic success of the North East of England and the national automotive sector

The IAMP is located on land to the north of Nissan within the administrative boundaries of Sunderland City Council and South Tyneside Council. The IAMP is to be delivered through a joint venture between each council, known as IAMP LLP, in conjunction with its developer partner Henry Boot Developments Limited. This development will be referred to as IAMP ONE.

The IAMP proposals are to create a world class location where automotive supply chain and advanced manufacturing businesses will innovate and thrive, benefiting from cluster co-location. The overall development will create around approximately 7,850 jobs from companies within these sectors that will benefit from being close to Nissan and from the infrastructure and skilled workforce that exists and will be trained for the future in this location.

The development and success of the IAMP is extremely important to the local, regional and overall UK economy. IAMP ONE will be its first phase of a comprehensive development.

The Relationship with IAMP TWO

The remainder of the IAMP, known as IAMP TWO, will be consented separately.

Originally, the whole of IAMP was designated as nationally significant by the Secretary of State under section 35 of the Planning Act 2008 (as amended) (PA2008). That meant that it could only be delivered by a development consent order (DCO) under the Planning Act 2008. A DCO allows planning permission and multiple other consents to be obtained for a project, and can include powers of compulsory acquisition to secure site assembly. Owing to the scale and urgency of demand for the first phase of IAMP, in December 2017 the Secretary of State varied his existing direction under section 35 of the Planning Act 2008, to the effect that IAMP ONE can be delivered by way of a planning application under the Town and Country Planning Act 1990. Under the varied section 35 direction, IAMP TWO is confirmed as a project of national significance and accordingly must be delivered by a DCO.

The application for the IAMP TWO DCO will be made to the Secretary of State later in 2018. Before that happens, further consultation on IAMP TWO will take place with the public and other stakeholders.

The proposed development is accompanied with a Environmental Impact Assessment for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('2017 Regulations'), an "*industrial estate development project on a site exceeding 0.5ha*", pursuant to part 10 (a) of Schedule 2 of the 2017 Regulations. For such developments, EIA is required in situations where development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The EIA considers the likely significant effects arising during the construction and operation of the scheme and the potential cumulative effects which may arise when considered with other relevant nearby development proposals.

The application has been advertised by the way of Site, Press and Neighbour notifications in accordance with the Development Management Procedure Order 2015 and The Environmental Assessment Regulations 2017. The EIA has been deposited with the relevant consultee's for consideration.

Site and Surroundings

The IAMP will be located on land to the north of the existing Nissan car manufacturing plant, to the west of the A19, to the south of the A184 and to the north of the A1290. This location benefits from its close proximity to Nissan and excellent transport links with opportunities for integrated connectivity provided by the surrounding strategic road network, rail and port infrastructure.

The IAMP ONE site boundary encompasses 61 hectares. The site contains a number of fields in arable cultivation, which are bounded by hedgerows. A small group of trees is located almost centrally. The River Don, and tributary, are situated in the north of the IAMP ONE Site. The agricultural land, where classified, Grade 3b.

The IAMP ONE Site undulates but generally falls towards a central shallow valley area which extends from half way along the north western boundary to half way along the south eastern boundary where the average site level is 35.0m AOD. Levels at the far north of the site area are 37.0m AOD and at the southern extent they reach 39.5m AOD.

Follingsby Lane runs through the site in a north west to south east direction. Access to North Moor Farm is provided from this route. The access to this farm will be retained, albeit the proposals are for part of the farm access to be realigned to follow the north western site boundary. .

Follingsby Lane connects to the A1290 to the south east and to the A194(M) beyond the IAMP AAP area to the north west, adjacent to the Follingsby Park industrial area.

The IAMP ONE Site is not subject to any statutory heritage designations of national or international importance. It does not contain any scheduled monuments or listed buildings / structures neither does it lie within a Conservation Area. The closest listed structure is the Grade II Listed Hylton Grove Bridge which crosses the River Don to the north of Hylton Bridge Farm and The White House. This bridge is located approximately 169m away.

There are no statutory protected habitats within the IAMP ONE site. However, there are two International / European designated sites within 10km3, four Sites of Special Scientific Interest (SSSI) within 3km, two Local Nature Reserves 5 within 2km and two non-statutory designated sites 6 within 1km of the site.

A wildlife corridor, as designated under Policy CN23 (Wildlife Corridor) of the Sunderland Unitary Development Plan, runs along the River Don. The northern and north western parts of the site fall within this wildlife corridor.

The Great North Forest Heritage Trail runs along Follingsby Lane and Downhill Lane to the north. This is a circular cycle and walking route which travels through the countryside of this former mining area in Tyne and Wear. The trail is 1o5km (65 miles) long and travels along Follingsby Lane to West Boldon, South Shields, Whitburn, Witherwack, Herrington, Hetton-le-Hole, East Rainton, Picktree, Rickleton, Beamish, Kibblesworth and Springwell. The route passes the Penshaw Monument, Lumley Castle and Beamish Museum.

The application has been advertised as a departure from the Area Action Plan, due to a small element of development in the ELMA area which is location within the Green Belt. The minor works that will be undertaken constitute minors development which are considered necessary and relevant to the development.

TYPE OF PUBLICITY:

Press Notice
Site Notice Posted
Neighbour Notifications

CONSULTEES:

Washington North - Ward Councillor Consultation
Castle - Ward Councillor Consultation
Network Management
Environmental Health
Environment Agency
Natural England
Southern Area Command - Police
NE Ambulance Service NHS Trust
Tyne and Wear Archaeology Officer
Campaign to Protect Rural England
Northern Electric
North Gas Networks
Business Investment
Fire Prevention Officer
The Highways Agency
National Grid Transco
Nexus
Northumbrian Water
Flood and Coastal Group Engineer
North Gas Networks
South Tyneside MBC
Gateshead MBC
Urban Design
Landscaping

Ecology
Director of Health
Health and Safety Executive
Planning Policy
Built Heritage

Final Date for Receipt of Representations: **13th May 2018**

REPRESENTATIONS:

Consultee Responses:

Washington North - Ward Councillor Consultation – no responses received

Castle - Ward Councillor Consultation - no responses received

Planning Policy:- The site is allocated for the Principal Uses of production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors under Policies S1, S2 and S3 of the adopted IAMP AAP. Whilst it is acknowledged that part of the red-line boundary for the application extends beyond the allocated development area, this is to be used solely as part of the flood attenuation infrastructure and would therefore not conflict with Policies S1 and S2 of the AAP. The supporting Planning Statement indicates that both the full and outline parts of the scheme would be for Principal Uses only, this should be secured through a planning agreement with the local planning authority. In addition, whilst the ancillary uses proposed are consistent with those permitted through Policy S3 of the AAP (Use Classes B1(a) and B1(b)), it should be ensured that they are of an appropriate scale. Policy S3 indicates that across the IAMP as a whole, up to 36,000sqm of employment space for Supporting B1(a) and B1(b) will be supported (i.e. 10% of the overall quantum of floorspace), therefore any ancillary uses should be limited to ensure that there is still scope for ancillary uses as part of further phases of the IAMP.

Policy S1 of the AAP requires development within the IAMP to contribute towards the comprehensive development of the IAMP as a whole. The proposals would provide for a substantial part of the necessary ecological mitigation for the IAMP within the Ecological and Landscape Mitigation Area (ELMA). The proposals would also set aside the necessary land to facilitate the upgrading of the A1290 and a new bridge across the River Don to access the northern employment area. This would ensure that the scheme contributes towards the comprehensive development of the IAMP and helps to facilitate the delivery of the necessary infrastructure identified through Policy T1.

Various policies of the AAP require the submission of detailed evidence documents to support any applications within the AAP area. The following documents have been submitted which meet the requirements of the AAP:

- Environmental Statement, incorporating Landscape and Visual Impact Assessment;
- Flood Risk Assessment;
- Design Code;
- Design and Access Statement incorporating Public Realm Strategy;
- Indicative Masterplan;
- Health Impact Assessment;
- Transport Assessment;
- Travel Plan;

- Car Parking Management Strategy;
- Road Safety Audit;
- Construction Traffic Management Plan;
- Outline Delivery and Servicing Strategy; and
- Planning Statement, incorporating Phasing Plan.

In conclusion, subject to it being secured through condition or planning obligations that the permitted development will only be for the Principal Uses identified within Policy S2 (plus ancillary uses identified through S3), the proposals would accord with the adopted IAMP AAP.

No additional comments have been submitted following the 2nd round of consultations.

Highways England - Highways England formal response to the above planning application. Having considered various documents submitted in support of the planning application Highways England are content that the application can move forward for determination at Planning Committee but subject to conditions being imposed in relation to the development's delivery and operation; our recommended conditions are set out within the appended response.

Highways England's view regarding the development has been made mindful of the Major Schemes identified for the A19 TESTOS and Downhill Lane junctions' anticipated commencement on site within 2019.

Our view regarding the traffic impact of the development during the interim period, prior to these improvements being delivered, is founded on the key principle of ensuring that the end uses conform to an Operational Management Plan (OMP) that specifies, as a minimum, that the shift change times of all B2 uses on site are off-set by one hour prior to those of Nissan, in the interests of maintaining network operation and safety. A draft OMP has not been submitted in support of the application and it is Highways England's recommendation, as set out in the attached conditions, that this document be prepared and agreed with Sunderland City Council in consultation with Highways England prior to any operation falling within Use-Class B2 being permitted to come into operation.

It is noted that the Transport Assessment (TA) supporting the planning application suggests that the above OMP be an interim arrangement, until such time as Highways England's Major Scheme at A19 Downhill Lane is delivered; this is not Highways England's view. The OMP is to be an in-perpetuity requirement for the operations arising from the IAMP One planning application and further will similarly be sought in relation to the subsequent IAMP Two proposals delivering the remainder of IAMP, in the interest of maintaining operational integrity and safety at the SRN.

Although the Major Scheme proposals at A19 Downhill Lane and TESTOS support the overall IAMP aspirations, the TA has highlighted two key areas of concern.
Following delivery of IAMP One the current SRN infrastructure at the A19 Downhill Lane junction will be subject to operational strain over longer periods than at present, specifically during the weekday morning. Any applications for further development within this area would be subject to significant scrutiny and need to clearly demonstrate that a severe and / or unsafe outcome would not result.

Similarly, the operation of the A19 / A1231 / Wessington Way junction is forecast to be subject to operational strain, specifically at the southbound off-slip from the A19. It is anticipated that, in the absence of a committed improvements at this junction, any applications for further development within this area, including that of IAMP Two, would need to address the operational and safety

concern at this junction before being accepted by Highways England as not resulting in a severe outcome.

Consideration of the Outline Construction Traffic Management Plan [CTMP] submitted in support of the planning application has identified a number of issues that have the potential to influence the functionality and operation of the SRN and, therefore, are relevant to Highways England:

- Disclosure of a finalised construction phasing plan for the proposed site would be welcomed;
- At this stage of the IAMP One development, a contractor for the proposed site has not been appointed, with detailed construction consent and a full works programme currently unavailable. Until such an appointment has been made, accompanied by the aforementioned consent and programme, we cannot determine the precise volume and type of construction related traffic, and as such, cannot fully quantify the possible impact upon the SRN;
- In order to allow a full and thorough assessment of the trip generation for the IAMP One site, up to date, accurate and development specific trip generation figures are required;
- A robust junction analysis of the immediate A19 / Downhill Lane junction should be undertaken by the developer as to evidence the operation of this section of SRN is not impacted by the proposed site traffic flows, once agreed;
- Future detailed iterations of the CTMP should disclose the timetabling of abnormal loads that will be accessing the proposed site;
- Future detailed iterations of the CTMP should disclose the full extent of measures to be put in place to manage the arrival and departure of abnormal loads, while confirming if any alterations to local highway or SRN infrastructure is required to cater for the movement of such loads;
- Further discussions should be held with Highways England, including evidence to be provided within future iterations of the CTMP, that deliveries to the proposed site will not take place in significant volume throughout peak travel periods, specifically peak traffic conditions at the SRN within the vicinity of the site;
- The use of A19 laybys as HGV holding locations is not considered appropriate and alternative locations will have to be determined and identified in future iterations of the CTMP;
- Such is the volume of construction staff that will be present on the proposed site, a far more detailed assessment of the modal split and volume of journeys anticipated with construction traffic accessing the site as to suitably evaluate the potential impact upon the SRN is required;
- The shift times of construction workers are to be confirmed as a matter of importance as to suitably assess the preferential time for construction vehicles to access the site as to mitigate impact upon the SRN.

In response to the above, Highways England's recommendation, as set out in the attached conditions, is that this document be prepared and agreed with Sunderland City Council in consultation with Highways England prior to development commencing on site.

Our consideration of the Outline Car Parking Strategy [OCPS] submitted in support of the planning application suggests, on the basis of the approximate figures provided, that the proposed car park for Unit 3 would not reach full capacity even assuming an all driver scenario. Given the assortment of strategies proposed by the Framework Travel Plan [FTP] to reduce single occupancy car trips to the site, we would recommend investigation of the feasibility of reducing the number of car parking spaces proposed to encourage sustainable travel and discourage single occupancy car journeys. We would also recommend that the OCPS form part of

the Framework Travel Plan, in order to avoid the likelihood of measures being proposed which would undermine the effectiveness to any TP measures

Our consideration of the Framework Travel Plan submitted in support of the planning application has identified shortfalls in bus provisions serving the site. Currently, excluding office hours, no shifts change is covered by a service covering both arrival and departure movements. The discrepancies between service availability and shift periods will inhibit the feasibility of bus travel for large proportions of the workforce. It is Highways England's view that a firmer commitment to the identification and provision of additional services is required if this mode of travel is to represent a viable alternative.

The IAMP AAP states that it will promote and facilitate a number of public transport measures including the provision of enhanced services to/from the surrounding residential areas and linkages to Metro services. This first phase does not address the stated objectives of the AAP with regards public transport provision and measures. As such we recommend that a Public Transport Strategy for IAMP as a whole be submitted and approved prior to the occupation of any units in order for them to demonstrate how Phase 1 fits in to the overall approach and that there is sufficient provision to ensure adequate modal choice.

It is also our view that the FTP would benefit from greater detail regarding the contact information, financing and wider responsibilities of the Travel Plan Coordinator [TPC] being included. Currently, the level of detail accompanying the promotional sustainable travel strategies for the IAMP One site are at a very high level. Firmer commitments to a range of detailed measures and tangible travel incentives are required if the site Travel Plan is to successfully encourage a more sustainable modal split. Further, significant efforts should be made by the Principal Travel Plan Coordinator [PTPC] to ensure that completed travel surveys are obtained from as many employees as possible; the suggested 30% response rate is not considered a sufficient robust dataset to underpin the requirements of the future IAMP One Travel Plans.

Regarding Targets and Monitoring: we have concerns regarding the approach detailed with regards surveys being undertaken within 6-months of unit occupation after which initial targets will be set. It is considered that by waiting 6-months the travel patterns of employees will be established and it could be argued that some measures to have achieved modal shift will have already taken affect. The survey undertaken within 6-months will establish how successful the initial travel plan measures have been and whether additional measures/interventions are required. It should be feasible to set an initial target based on census data or neighbouring sites, before occupation as part of the FTP. With regards Table 2 within the FTP, while basing this on the 2016 travel survey for NMUK, it is not clear whether this represents an improvement or is just a reflection of what can reasonably be expected without the benefit of a Travel Plan being in place and clarification is required.

As the first phase of IAMP, we would recommend the FTP should facilitate the development of an overarching Area Wide TP whereby TPs for individual units sit within a more comprehensive approach for the AAP area. We have concerns regarding the possible fragmented/silo approach with regards how the PTPC and individual TPCs will operate. Further detail on future management arrangements would be appreciated, particularly with regards reviewing and agreeing Area Wide Travel Plan, Individual Travel Plans, Parking Strategy/Management, Operational Management Plan etc. A single appointment does not appear to be sufficient oversight or have adequate authority.

Highways England's recommendation, as set out in the attached conditions, is that there should be further development and consultation regarding the FTP prior to development commencing

and coming into use, in the interest of reducing single occupancy car travel so as to minimise SRN impacts from the outset and before travel behaviour becomes ingrained.

Although no mitigation works are identified at the SRN, we have considered the Road Safety Audit [RSA] submitted in relation to those identified at the A1290 corridor approaching the A19 Downhill Lane junction. It is noted that the recommendation in relation to the location 1 issue (minor junction of Downhill Lane and A1290 between the proposed site access and A19 Downhill Lane junction) suggests providing a left in / left out arrangement. Although the minor Downhill Lane arm in this location is anticipated to be lightly trafficked, the provision of a left in / left out as recommended would increase trips towards the current A19 Downhill Lane junction which, in turn, may encourage banned U-turn movements from the right-turn lane towards the A19 south.

In response to the above, it is recommended that maintaining full movements out whilst banning the southbound right-turn in, with this movement being undertaken at the southern Downhill Lane connection with the A1290, should be considered as an alternative response to the RSA problem in this location.

Given the possible consequence for SRN safety depending upon the response to this RSA problem, Highways England request further consultation in relation to the detail design and agreement to the highway works identified at the A1290 corridor.

Proposed conditions should member be minded to grant consent:-

This response represents our formal recommendations with regard Sunderland City Council planning application 18/00092/HE4 – Land To The North And West Of The A1290, And North Of Nissan, Washington, Sunderland and has been prepared by Paul Dixon, Asset Manager.

Founded on Highways England's examination of the Application's supporting documentation we are content that the Application moves forward for determination at Planning Committee. However, this is on the basis of the following recommended conditions relating to the development's delivery and operation being imposed on any consent granted:

Condition 1

The site shall be delivered in accordance with a Construction Traffic Management Plan, founded on the Outline Construction Traffic Management Plan submitted with the Application. The Construction Traffic Management Plan is to be agreed in writing with the Local Planning Authority in liaison with Highways England. No deviation from the agreed Construction Traffic Management Plan shall be permitted without the express written agreement of the Local Planning Authority in liaison with Highways England.

Condition 2

All uses falling within Use-Class B2 shall operate in accordance with an Operational Management Plan. No operation falling within Use-Class B2 shall be permitted to come into use until the Operational Management Plan is agreed in writing with the Local Planning Authority in liaison with Highways England. The Operational Management Plan shall include but not be limited to specifying the shift change times that all Use-Class B2 shall operate. No deviation shall be made from the shift patterns detailed within the agreed Operational Management Plan without the express written agreement of the Local Planning Authority in liaison with Highways England.

Condition 3

No development pursuant to the application shall be permitted to come into use until the Framework Travel Plan submitted in support of the application is developed further and agreed in writing with the Local Planning in liaison with Highways England.

Condition 4

All individual end users are required to operate a Travel Plan developed in accordance with the agreed Framework Travel Plan. The Travel Plans are to be agreed in writing with the Local Planning Authority in liaison with Highways England.

Condition 5

No development pursuant to the application shall be permitted to come into use until a Public Transport Strategy for the whole of IAMP is submitted and approved in writing with the Local Planning Authority in liaison with Highways England. The Public Transport Strategy shall demonstrate that there is sufficient provision to ensure adequate modal choice for the whole of IAMP and how the IAMP One first phase fits with the overall approach.

Reason for proposed conditions

These conditions are in the interest of maintaining Strategic Road Network operation and safety.

Following consultation on the addendum to the Transport Statement Highways England have confirmed no objections to the proposed development and have recommended that conditions be imposed as set out in original consultation response and second consultee response received 26th April 2018.

Network Management -

Consideration has been given to compliance with adopted UDP policies, the draft Core Strategy and Local Plan policies and those adopted within the IAMP Area Action Plan.
The application is supported by a range of documents listed below, which address the traffic and transport implications of the proposed development.

- Environmental Statement Chapter L – Access and Transport
- Transport Assessment
- Framework Travel Plan
- Car Parking Strategy
- Outline Delivery and Servicing Strategy
- Outline Construction Traffic Management Plan
- Stage 1 / 2 Road Safety Audit

Assessment of Traffic Impact

The applicant has considered traffic impact at eleven junctions, on the strategic and local road network specifically in relation to the IAMP ONE proposal.

For assessment of the A19 / A184 Testos Roundabout, A19 / Downhill Lane, and A19 / A1231 / Wessington Way junctions with the strategic road network; Highways England will be consulted and respond in relation to potential impact on these junctions. Both the Testo's and Downhill Lane junctions are currently subject to review as part of the Development Consent Order process for

Major Highway schemes. Both schemes are expected to support and provide wider benefits to the delivery of the full IAMP.

The previous Downhill Lane junction scheme removed double roundabouts and replaced with traffic signal control to address existing road network issues and committed developments, but is unlikely to be able to accommodate traffic growth associated with the full IAMP development detailed within the IAMP Area Action Plan.

The six existing junctions tested on the local road network were A1290 / Cherry Blossom Way, A1290 / Sulgrave Road / Glover Road, Glover Road / Spire Road, Glover Road / Silverstone Road, Glover Road / A195, and the A1290 / Nissan access.

In addition, both the proposed eastern and western new junctions have been tested to ensure that they can accommodate the traffic generated by IAMP ONE and can safely operate as priority junctions.

The applicant advises that there will be no detrimental impact on traffic movements to and from the A1290 / Nissan access. This statement was questioned as part of pre-application discussions and further evidence was requested for this junction to be tested with a level of development traffic including the first plot (unit 3). ***This outstanding action point needs to be confirmed.*** 67% of all vehicle trips for IAMP ONE are predicted to be via the Downhill Lane junction therefore delivery of the northern junction and new spine road will be key to minimising impact on the local road network.

Refer to TA Appendices

Committed Development
The application takes into account traffic generation from committed development from previously approved applications. These include Turbine Business Park and the Hillthorn Farm Enterprise Zone. The assessment also includes traffic generated by the proposed Renewable Energy Centre. This is still in the planning stage and therefore not committed development. However, traffic generated by the Renewable Energy Centre has been included in this assessment, which effectively double counts the amount of traffic and is considered to be a robust review of traffic to be generated by these proposals in proximity of IAMP ONE.

Trip Generation

To ensure that the new trips generated by IAMP ONE can be accommodated on both the local and strategic road network without causing a severe impact in terms of both congestion and safety, the applicant is proposing that the peak demands for new trips occur outside of Nissan shift patterns. It is known that Nissan plant operates on a 24 hour day with three shift patterns. During these shift changeover times, there are short periods where traffic levels increase significantly and queuing and congestion issues occur. This is evidenced by queuing on the A19 off-slip with the Downhill Lane junction.

Has a two hour (or greater) off set from NMUK shift patterns been considered?

It is noted that even with the proposed one hour off-set, that IAMP ONE traffic will still create delay and queuing on the A1290 back onto the Downhill Lane junction with the A19. To address this, the applicant is proposing to provide an additional southbound lane by widening a 300metre stretch of the A1290 which will accommodate up to an extra 50 car lengths. This widening is proposed on the western side of the A1290 with the shared pedestrian / cycleway on the eastern side retained as existing.

It is considered that this mitigation measure will accommodate the predicted demand over the shift change period and address the issue of queuing from the A19 northbound off-slip. Based on the adopted Area Action Plan, it is expected that further development is planned beyond the IAMP ONE proposals. This will generate further demand on the local and strategic road network; however this is likely to be accommodated by the Highway's England scheme for A19 / Downhill Lane and further dualling works to the A1290 corridor.

Based on the evidence submitted, the development traffic can be accommodated within the existing capacity of junctions located to the west of IAMP ONE taking into account cumulative traffic impact generated from Turbine Park and Hillthorn Farm. This is on the basis that the shift patterns for operational staff for IAMP ONE fall outside of the shift patterns operated by NMUK and other established key chain suppliers. It is noted that traffic movements associated with Unipres, who are a Nissan supplier based on Cherry Blossom Way, have been surveyed and use to identify peak demands on the road network. This methodology is considered to be a robust approach taking into account local factors impacting on the road network and the site specific nature of businesses directly linked to Nissan.

The proposed implementation of an Operational Management Plan will be a key requirement to ensure there are no significant implications likely to cause congestion or road safety issues on both the local and strategic road network.

The realignment of the A1290 adjacent to Seven Houses completed as part of the Hillthorn Farm Enterprise Zone infrastructure works will provide additional link capacity on the road network. Other improvements yet to be completed are the completion of the link road through to Nissan Way and dualling of Nissan Way to the junction with the A1231. These works are on-going and expected to be completed July / August 2018 and will assist in the redistribution of traffic from Glover Road / Spire Road by creating capacity and improved links to the A1231.

Proposed Development

Vehicular Access

Two new priority junctions are to be created to either side of the existing entrance to the Nissan plant by this proposal. Both junctions will be linked by a new 10.8m wide spine road with right turn pockets provided at entrance points to each plot to enable access without compromising flows along the main spine road. Other than unit 3 for which detailed consent is sought, it is noted that the vehicular access points are described as indicative and based on a 50m centre to centre with a 25m stagger. This arrangement does not meet with Sunderland Council's guidance, although it is noted that the access locations are based on maximum building footprints and subject to change. A key issue will be the provision of acceptable visibility splays based upon the design speed of the spine road. Any potential changes to these locations will need to be agreed to ensure junction spacing standards are not compromised, as moving one may have consequences for adjoining plots.

Based on the information provided on trip generation and distribution, it is considered that both the proposed eastern and western plots can operate as priority junctions. At this stage, only the potential occupier of unit 3 is known and based on the number on employees, shift patterns requirements the traffic can readily be accommodated on the local road network. It is recommended that both new junctions include for the installation of ductwork and chambers to enable the provision of traffic signal control should evidence confirm that this is necessary as part of planning applications beyond IAMP ONE.

The delivery and completion of the new spine road will be required to support the full IAMP ONE proposal. Completion and opening of the road to traffic will need to be determined and agreed at the outline stage to enable delivery of all of the proposed nine units. The first unit could potentially be accessed via the proposed western junction, but this would result in development traffic traveling through the A1290 / Nissan junction. As noted traffic generated by unit 3 will not significantly impact on the operation of this junction outside of NMUK shift changeover times. The applicant will need to enter into agreements under Sections 38 and 278 of the Highways Act to cover requirements for adoption of the new spine road as public highway, and improvements and alterations to existing public highway. The new roads, footways, street lighting and associated highways works for IAMP ONE will need to be designed and constructed to Sunderland City Council standards. The applicant will be required to meet any necessary costs involved with the design, technical approvals and supervision associated with the highway infrastructure. Consideration should be given to any highway requirements by South Tyneside in relation to the wider IAMP given the cross-boundary nature of the development.

Parking Provision

A Car Parking Strategy has been submitted for consideration. Sunderland City Council guidance has been considered as well as national guidance (NPPG) which allows parking provision to be based on operational requirements and needs of the end user. The applicant has investigated parking provided at Unipres based on Cherry Blossom Way and also SNOP (proposed occupier of unit 3) based at Rainhill Road. The strategy also includes the introduction of permits for employees to help manage use of the car parks. Any charge associated with the issue of permits will be a decision for the end user, and is discouraged as it may encourage parking outside of the allocated car parks.
IAMP ONE proposes a total of 2629 on-site parking spaces based on the Sunderland adopted parking guidance of 1 space per 50m2 of gross floor area. The number of spaces is calculated on maximum building footprints which may change on end use requirements as part of reserved matter applications.

Unit 3 proposes 276 on-site parking spaces, this is below the parking guidance, and is instead based on parking levels provided at the existing premises. There are not known to be any parking issues associated with the existing Rainhill Road site, and therefore the approach is considered appropriate.

Each car park will need to provide Electric Car Charging Points. The specification and management of charging units will need to be agreed. Accessible parking for users with disabilities is provided at the recommended number of 1 per 30 bays.

Proposed Unit 3 (SNOP)

It is noted that the end-user identified for unit 3 is SNOP, who are a NMUK supplier based in Washington at Rainhill Road. There do not appear to be any issues with car parking with the existing site and a similar level of on-site car parking provision is considered acceptable should the proposal just involve a transfer from the existing premises.

Confirmation will be required that SNOP intend to sign up to an Operational Management Plan which will specify specific shift pattern arrangements offset by one hour to NMUK shift pattern change over times.

The indicative master-plan indicates a potential future expansion to unit 3. *Do SNOP intend to increase the workforce and staffing as part of the business operation as this will impact on traffic*

generation and requirements for parking provision? Any future expansion would be subject to submission of a planning application with the relevant supporting documents.

Follingsby Lane

The applicant is proposing that the eastern extent of Follingsby Lane be subject to a restriction of vehicular rights. This will require a separate statutory consultation through the Traffic Regulation Order process. Certain vehicles would be exempt from the restriction such as emergency service vehicles, highway operational maintenance and statutory utility service vehicles. The timing of the statutory consultation and legal process will need to be agreed. It is likely that discussions will also be needed with third parties and private landowners, residents and any affected businesses who may be impacted on this proposal.

There is an existing constraint on Follingsby Lane where the road passes over the River Don at Hylton Bridge. Given the restricted road width passing places and traffic signal control will need to be considered.

Follingsby Lane will initially be a route for non-motorised users, and would require improvements including signing and lighting to provide for safe use.

Access will need to be retained for residential / agricultural right of access to North Moor Farm with rights permitted through the Traffic Regulation Order.

Consideration should be given to accommodating bus services along this route as part of a Public Transport Strategy. This would allow connection with other employment sites and transport interchanges including Follingsby Park and Heworth Interchange to improve public transport links and connect with the Metro system.
Plans to further expand Follingsby Lane Business Park may impact on this proposal and need to be discussed with Officers from Sunderland, South Tyneside and Gateshead Council

Details of proposed changes to the existing road layout will need to be submitted for approval.

Outline Delivery and Servicing Strategy

An Outline Delivery and Servicing Strategy has been submitted for consideration. The Delivery and Servicing Plan for IAMP ONE considers freight movement by HGV only.

It is noted that the plan seeks to restrict movement of freight by road to hours outside of NMUK shift patterns where peak demand occurs. The units to be located on IAMP ONE are expected to be 24 hour operational facilities similar to NMUK and the supply chain companies located nearby. It is recommended that recognised fleet operators be used whenever possible to ensure strict control of HGV parking outside of scheduled delivery times.

HGV Movements and Lorry Parking

Businesses locating within IAMP ONE will need to incorporate lorry and trailer parking associated with their logistic operations. This will need to be adjacent service yards to allow short stay parking for waiting prior to unloading or reloading with goods. These facilities will need to be different for each unit and tailored to suit the needs of the business. This requirement is important to ensure no lorry parking takes place on the public highway or in nearby areas.

All HGV turning movements and HGV parking will need to be accommodated on site within dedicated hard-standing and lorry parking areas located in each plot. Based on the footprints of the units there appears to be sufficient space to accommodate short stay HGV parking within each site.

A dedicated HGV parking facility is unlikely to address the wider issue of lorry parking (which is a local, regional and national issue) and may result in attracting HGV from across the region as no other local authority across the region has such a facility.

Refuse storage will need to be provided within the service yard area for each unit. Vehicle trips associated with collection arrangements are expected to be minimal.

Traffic Management

The proposal will need to consider construction operations and routing with regard to the Highways England Major Projects for A184 /A19 Testos Junction and A19 / Downhill Lane. Both projects will have separate delivery programmes, but both will impact on the A19 and A1290. It is recommended that a Traffic Management Working Group be established with representatives from Sunderland City Council, South Tyneside Council, Highways England and any other key stakeholders.

Temporary diversion routes will need to be agreed in advance with an 8 week lead in. The applicant will need to contact Asset and Network Management on (0191) 561 7527 in advance of any works requiring traffic management to ensure safe systems of work are put in place along with any necessary temporary road or footway closures.

The design of the new spine road and the two new junctions does not include for any waiting restrictions to deter on-street parking. Considerations will need to be given to the introduction of appropriate waiting and loading restrictions, or possibly a clearway order. This would need to be introduced through a Traffic Regulation Order and may be a requirement prior to occupation of the ***XX unit (details to be confirmed).***

Road safety

Reference is made to a review of personal injury accidents over a 3 year period (P9 of ES Chapter L). However, a 5 year period (P25) has been assessed which is appropriate for a development of this scale. The road traffic collisions on the local road network have been assessed, and there is no single reason for the incidents recorded relating to the existing road network. Highways England is to be consulted on the development proposal, and will be expected to comment on road safety issues associated with the A19 and its junctions with the local road network.
Road Safety Audit

A Stage 1 / 2 Road Safety Audit report has been submitted for consideration. The Audit team undertook a site visit to look at consider existing road conditions and reviewed the drawing submissions.

The audit raises some concerns with the proposed alterations to the road alignment on the A1290. However, it is noted that these issues can be addressed through the completion of the detailed design. Details of signing, carriageway road-markings and junction markings will be required to ensure the proposed alterations address road safety concerns. Amendments are also required to traffic splitter islands, pedestrian refuge dimensions and footway/cycleway connections. These changes are required to ensure the road layout provides safe crossing points for pedestrians and cyclists.

Details will need to be submitted to demonstrate that vehicle swept path and turning manoeuvres can be accommodated both on the alterations to the existing road layout and also for plot access locations on the new spine road. This could be provided using appropriate software.
However, the documents do not include a review of street lighting proposals. This will need to be considered particularly in relation to the proposed landscaping scheme.

Details of landscaping proposals and tree planting will need to be reconsidered. The landscaping as proposed may impact on visibility at plot accesses and potentially obscure signing, street lighting and impact on visibility splays to the detriment of highway safety. Details of future landscaping maintenance will need to be provided to ensure that there will be no detrimental impact on safe use of the highway.

Road Traffic Noise

Environmental Health officers will be consulted on the development proposal, in relation to noise generated through increased traffic flows and HGV movements.
It is noted that the residential areas of Town End Farm, Hylton Castle, Castletown and West Boldon have been identified as sensitive receptors and are to be assessed for potential noise impact arising from the development. This should also include nearby residential properties and consider road traffic noise levels for residential farm holdings (West Moor Farm).

Further information should be provided to confirm that noise generated by construction and operational traffic does not exceed statutory threshold levels (to be confirmed).

Public Transport

The proposed development will need to improve and provide access to public transport. Initially, it is expected that this will be by improving means of access to promote the use of existing bus services.

The nearest bus stops towards Sunderland/South Shield, from Durham/Newcastle/Washington on A1290 mean pedestrians need to cross the road. Appropriate pedestrian crossing points will be required on the A1290 to enable safe access to east and westbound bus services.

In terms of existing bus service provision, bus services 50/50A and 56 currently operate along the A1290. The 50 currently does not serve A1290 during evenings and based on existing bus timetables no service will be available to employees travelling to Sunderland, South Shields or Boldon when working nightshift.

The 50A route during evenings is via A19 and A1231 serving Waterview Park instead of the A1290.

The Metro system timetables will not cater for employees working shift patterns.

The application includes for improvements to existing bus stops with new footway links and bus shelter provision. Subject to this being provided, this is considered acceptable as the minimum standard to serve the first building (unit 3). However, greater consideration will need to be given to access by public transport and improvements be introduced before the occupation of XX of the development (details to be confirmed).

To ensure use of public transport is available for IAMP ONE, discussions will need to take place with the bus operators to secure the diversion of these services onto the new spine road. Bus stops will need to be provided along the spine road at appropriate locations and not conflict with the accesses to the proposed units.

Public Transport Strategy

As part of the wider IAMP development, the AAP includes for the provision of a new bridge over the A19 connecting to Washington Road and north Sunderland. This will be a key link for routing bus services to Sunderland and South Tyneside and enable accessibility for employees. Improved routes and services will also need to connect to Washington and make use of interchanges at The Galleries and Concord.

The need to create new bus links to enhance services to residential and business and major employment sites over a wider area will be essential to meet the needs of new employees. This should include consideration of bus links to South Sunderland Growth Area and Sunderland City Centre, South Shields and Follingsby Park via Follingsby Lane to connect with Heworth Interchange.

Worker specials should be considered and provided where necessary, particularly for staff working the shifts outside of normal bus service timetables.

Funding of new or altered bus services and secured services / worker specials will need to be discussed and agreed.

Pedestrian and Cycle Accessibility

The proposed development links with existing infrastructure in the immediate vicinity and utilises existing shared footway/cycleway connecting with Downhill Lane to the east and Glover Road to the west.

The new spine road includes 3metre wide shared use footway/cycleway provision. Pedestrian refuges are to be installed to provide safe crossing points.

This will assist improving links to areas beyond to provide positive and viable safe to use alternatives to reduce the need to travel by car with connections to Sunderland, South Tyneside and Gateshead.

Each plot will need to include facilities to promote access by cycling. Cycle hubs will need to be integral and form part of transport hubs serving the wider IAMP development.

Public Rights of Way

There are no registered public rights of way across, or routed directly through the development site. The applicant should however be aware of the provisions of section 31 of the Highways Act 1980 which relates to presumed dedication of public rights of way where there has been 20 years use by the public as of right and without interruption, and also of Section 53 of the Wildlife and Countryside Act 1981 by means of which such ways may be added to the Definitive Map. There is the potential for claimed routes across the development site. Should evidence of any claimed routes come forward then will need to be submitted to Sunderland City Council's Public Right of Way Officer.

The track to the immediate east of West Moor Farm is not directly affected by this application.

An access track to North Moor Farm is to be realigned with a new route provided via Follingsby Lane. It is understood that the applicant has discussed and arranged this work.

Framework Travel Plan

A travel plan should be developed in accordance with Department for Transport guidance entitled 'Good Practice Guidelines: Delivering Travel Plans through the Planning Process'.
It is recommended that a work place travel plan should be provided to support employees with travel information based on journey to work surveys. A properly implemented Travel Plan Management System can produce Travel Plans and a postcode plot showing where employees live. If employees complete a pre-occupation travel survey this data can be used on the postcode plot to indicate how they would intend to travel and could highlight potential car share opportunities.

Welcome Pack to include Sunderland and South Tyneside cycle maps, bus taster tickets, car share will need to be promoted to meet targets set to reduce single occupancy car.
The Framework Travel Plan includes recommendations for physical measures including provision of cycle storage and locker facilities, and soft measures for workplaces to encourage employees to use alternatives to driver single car occupancy. The introduction of Car Clubs and car share schemes would be a positive way of reducing car trips, particularly given the timings of the proposed shift patterns where commercial bus services do not operate or pedestrian / cycle use may be an issue.

Data collection will need to be in the format of "Jambusters" which is a travel plan monitoring system being adopted by Sunderland City Council as part of a regional management tool to measure targets and identify areas where promotion is needed.

The early delivery of infrastructure will be needed to provide alternative option to car use.
A Travel Plan Co-ordinator central to all of the businesses proposed to operate from IAMP ONE will need to be appointed. This Co-ordinator will be expected to link in with established travel plan networking arrangements adopted by existing nearby business including NMUK, suppliers and nearby businesses. Car share initiatives and Network One passes should be offered to new and existing employees. The forming of a Steering Group has been suggested initially for a period of three years. Initially it is recommended that this group meet quarterly rather than annually. Discussions will be required with regard to the appointment of a Principal Travel Plan Co-ordinator and subsequent Travel Plan Co-ordinators employed by end users of each unit.

Further sustainable travel guidance can be provided by Sunderland's Travel Plan Officer. This requirement will need to be detailed within a suitably worded planning condition.

Leamside Line

The Leamside line is located immediately to the western boundary of the proposed development. This still exists as a rail corridor although the line has not been in use for a number of years.
It is recommended that consideration be given to freight movement by rail via the Leamside line as part of any future wider development associated with the IAMP Area Action Plan.
Operational Management Plan

To ensure that the existing Downhill Lane junction operates safely with the proposed increase in capacity, there will be a requirement to place a condition restricting the shift patterns and change over times. The times will be offset from the NMUK shift pattern times by 1 hour. This requirement is in addition to the proposed widening on the A1290 to provide queuing capacity on the A1290.

This is a key document and will need to be subject to a suitable worded planning condition, to ensure that the proposal will not severely impact on congestion or the safe use of the highway network

Outline Construction Traffic Management Plan

An Outline Construction Traffic Management Plan has been submitted for consideration. In terms of access routes for HGV movements involved with earthmoving and ground-works, a route management plan will need to be defined within a detailed Construction Traffic Management Plan. To ensure minimal disruption to residential areas and commuter routes, the majority of trips are expected to be via the A1290 in order to access the A19 both north and southbound. Any other trips are expected to be via the A1231 connecting with the A1(M) to the west. A defined route map will need to be referenced as part of a suitably worded planning condition.
Given the likely volumes of material to be exported and imported, large earthmoving plant will be located on site for a lengthy period. This plant and equipment may need to be escorted to and from site, with arrangements agreed in advance with Network Operations at Sunderland City Council and Northumbria Police.

Further details are required showing temporary access arrangements from the A1290 / Follingsby Lane and the temporary access to the west, referred to in the outline CTMP. Both accesses will need to be laid out and constructed to ensure that there will be no detriment to the safety of other road users. Given the length of time these temporary accesses will be used, the entrances should be formed using kerb-lines and surfaced with an appropriate tarmac road construction.

Construction Plant and Contractor Traffic

A traffic regulation order is planned for a section of Glover Road to restrict HGV movement. This measure is to be provided as part of the Enterprise Zone works for Hillthorn Farm. Consequently, this route will not be available for general HGV or HGV construction traffic (Sulgrave Road). Consideration will need to be given to restricting access to the site to times outside of NMUK shift change over times and AM/PM peak demands particularly for site operations involving site clearance, earthworks and import of fill material. It is expected that a significant volume of material will need to be exported and imported by waggon, and this will need to be co-ordinated to ensure that there will be no significant impact on safe use of the highway.
Details will include locations of site compounds, contractor parking, wheel washing and/or road cleaning operations. The latter will be needed to ensure appropriate control measures are in place to prevent mud or debris being deposited on the highway. An on-site wheel washing facility is considered necessary, and be supplemented by road sweeping plant if required.
Given the number of construction jobs associated with this development, parking is expected to be provided on site. However, off-site parking should also be considered and a temporary park and ride facility provided off site. Timing of site operations will need to be addressed to ensure that there will be no conflict with peak hour traffic flows on the road network.

Temporary traffic management and speed restrictions will be required on approaches to site entrance/s to haul routes for earthmoving equipment and plant. Abnormal load routing for cranes and large scale building assembly product will be required.

Delivery times are to be restricted to the following:

Mon to Sat 08:00-14:30 (further discussion required to agree timing to avoid NMUK shift changes)
Mon to Sat 17:00-06:00

Highway Drainage

The new spine road and proposed widening of the A1290 will require additional capacity for surface water run-off. Drainage details and connections will need to be agreed through consultation with the Local Lead Flood Authority.

Details of offsite drainage connections within public highway will need to be agreed along with temporary traffic management arrangements.

Key Statutory Consultation Responses

Highways England Response

Nexus Consultation Response – a response has been received in support, and includes recommendations towards a Public Transport Strategy. Further discussion required.

South Tyneside Council Response

Summary

The proposed priority junction arrangements and 1 hour offset will enable the local road network to accommodate the critical periods of traffic demand, and allows for alternating peak demand periods (15minute inter-peak demands for NMUK). Key to this will be the control of shift pattern arrangements through the Operational Management Plan.

The transport evidence and associated documents submitted with this application addresses the main issues on traffic generation. However, a number of conditions will be required to ensure that there will be no severe impact on the local and strategic road network in terms of congestion or road safety. This is in accordance with the current adopted UDP for Sunderland and the joint IAMP AAP Policies between Sunderland and South Tyneside Councils.

Specific AAP transport policies are as follows:-

T1: Highway Infrastructure
T2: Walking, Cycling and Horse Riding
T3: Public Transport
T4: Parking

Planning Conditions

Conditions are recommended to address the following:

Delivery of a scheme of road widening to the A1290 prior to the occupation of *XX unit (details to be confirmed).*

Delivery of new spine road prior to occupation of *XX unit (details to be confirmed).*

Provide outstanding detailed highway designs identified within the Road Safety Audit
Delivery of the new 3metre wide shared use footway / cycleway connecting to the A1290 / Downhill Lane

A detailed Delivery and Servicing Strategy to restrict deliveries to times outside of NMUK shift patterns, and specify HGV parking provision to meet operational requirements will need to be submitted for consideration. This will need to be agreed prior to the occupation of ***XX units (details to be confirmed).***

Appointment of a Principal Travel Plan Co-ordinator, provision of a detailed Travel Plan based upon each business and monitoring, data collection

Delivery of public transport improvements prior to the occupation of unit 3

A Detailed Construction Traffic Management Plan will need to be submitted for consideration. Scheme of Works details to be agreed prior to any earthwork operations commencing on site

Advisory Notes

Establish a Traffic Management Working Group to coordinate development and associated highway works with Highways England

Establish a Public Transport Working Group to secure improvements to bus services

Establish Travel Planning Steering Group to coordinate sustainable travel measures

Make arrangements for the delivery of a Traffic Regulation Order to prohibit certain vehicles from using a section of Follingsby Lane

Enter into Section 38 and 278 Agreements to enable the road-works to be delivered in accordance with highway adoption standards

Local Highway Authority response to addendum to Transport Environmental Statement section.

Further comments have been received from the local highways authority. The principal of development is considered acceptable in highway terms subject to suitably worded conditions. The content of the second response is contained with the comments section of the main report under Transportation and Accessibility.

Nexus - Nexus welcomes the prospect of the development of the first phase of the IAMP ONE site. From the information submitted with the application, the site layout will be broadly compliant with the Nexus Planning Liaison Policy guidelines in terms of accessibility to bus stops, and the development as a whole will be served by existing bus services meeting our policy criteria relating to service frequencies.

Nexus also welcomes the proposed improvements to existing bus stops serving the site; please liaise with our Bus Infrastructure team as normal, prior to any works taking place.
This application represents the first of several major developments which will generate a collective set of needs for better bus services to and from the IAMP, and the requirement for investment in the proposed public transport hub across the A1290 road from the proposed development. This is set out in Policy T3: Public Transport, in the adopted International Advanced Manufacturing Park Area Action Plan, which states:

a. To promote sustainable transport, development must include:

i. provision of enhanced bus services between the IAMP and:
a) surrounding residential areas;
b) Heworth and Sunderland multi-modal transport interchanges; and
c) Hebburn, Jarrow, South Shields and Washington centres;
ii. bus priority measures on the key routes entering the IAMP;
iii. adequate provision for buses on the proposed new bridges over the A19 and over the River Don;
iv. new bus stops and improved waiting facilities within the IAMP AAP area; and
v. new traffic signal installations incorporating facilities to enable priority for buses.

The application as submitted does not indicate how the development will contribute towards the fulfilment of Policy T3, neither is it compliant with paragraph 126 of the Area Action Plan which states:

A study of public transport provision for the IAMP is being led by Nexus. Any application for the IAMP must have regard to this strategy
.
The support of Nexus for this application is therefore conditional upon commitments being demonstrated by the developer and/or the local planning authority that the progress of this application will include due consideration being given to Policy T3 and paragraph 126 of the Area Action Plan, to ensure that all developments contribute financially towards the development of the future public transport requirements of the IAMP site. Nexus officers will willingly liaise with the local authorities responsible for the development of the IAMP, in order to achieve these objectives.

Response of Nexus dated 10 May 2018

Thank you for the opportunity to respond to this application.

Nexus welcomes the prospect of the development of the IAMP ONE site. From the information submitted with the application, the site layout will be broadly compliant with the Nexus Planning Liaison Policy guidelines in terms of accessibility to bus stops, and the development as a whole will be served by existing bus services meeting our policy criteria relating to service frequencies. Nexus also welcomes the proposed improvements to existing bus stops serving the site; please liaise with our Bus Infrastructure team as normal, prior to any works taking place.
Since receiving notification of this application as a consultee, Nexus has been made aware that, following the agreement of the Secretary of State to vary the Section 35 direction of the Planning Act 2008, the Development Consent Order boundary has been amended to exclude the early release site (IAMP ONE) and to allow this to come forward via this stand-alone planning application.

Despite the public transport links provided by existing bus services 50 and 56 between the IAMP ONE area and a number of destinations, there are likely to be locations within the employment catchment of IAMP ONE where it may prove difficult to access the site by sustainable transport. Once the initial Highways England requirement for 0600 shift changes at IAMP ONE has elapsed, following the completion of A19 junction improvement at Testos and Downhill Lane, provision of a wider range of public transport links is likely to become more viable.

To address the issue described above, discussions have taken place between Nexus and IAMP LLP’s legal representatives, and Nexus recommends to the local planning authority that the following planning condition be included within any grant of permission for this application:

Not to occupy more than 3 units prior to the submission to the local planning authority of a report assessing the feasibility of a demand-led bus service for workers at the development. The report shall be prepared in consultation with Nexus and at least two transport providers. The report shall address the following:

- *Existing commercial models of demand-led employee bus services (with case study)*
- *Level of demand from current employees at IAMP ONE required to make a pilot service viable to be assessed, with the assessment to be repeated at the time of occupation of each further unit, to be discontinued as and when a viable demand-led bus service has been established*
- *(If viable) proposals for implementing a pilot service to include: timing, duration, scope, funding and geographical coverage of such a pilot service*
- *(if viable) criteria for monitoring and evaluating such a pilot service*
- *Methodology to establish whether to (a) extend the pilot service, (b) transition from pilot service to either a permanent demand-led employee bus service or a local bus service (in each case with provision for future review) or (c) cease to operate the pilot service*

The recommendations of the report shall be implemented as approved by the planning authority. In the longer term it is recommended that an IAMP Public Transport Delivery Group is constituted following determination of this application, with representation from Nexus; Sunderland, South Tyneside and Gateshead Councils, the IAMP ONE site Travel Plan Co-ordinator and bus operators, to determine unmet public transport needs at IAMP ONE, and how these best can be provided for and integrated within the wider package of public transport required as part of the Development Consent Order process associated with the planning and delivery of IAMP TWO.

Environmental Health - Public Protection and Regulatory Services has undertaken an initial review of the submitted documentation in respect of IAMP One. Although the conclusions of Chapter D (Air Quality) are accepted, further information is required to facilitate a complete and robust assessment of the proposal in terms of land contamination and noise. Further details in this respect are provided in the table below.

It should be noted that both the noise and air quality chapters are heavily dependent upon the acceptance of the submitted traffic data. If traffic data is altered from that used in the assessment of Chapters D and E, it may be necessary to re-run the predictive models and review anticipated impacts;

The following appraisal of the submitted documentation may be useful to the Applicant in the determination and preparation of addition works and information;

Land Contamination

Although the ES discusses ground contamination, the supportive Phase I Ground Investigation has been reviewed and conditions proposed on the hybrid application.

Air Quality (Chapter D)

Construction Phase

The Assessment has been undertaken in line with IAQM Guidance on the assessment of dust from demolition and Construction (2014).

This method considers the magnitude of the dust emission from earthworks, construction and vehicle trackout whilst also assessing the sensitivity of receptors to dust effects, the numbers of receptors and their proximity to the site. The method also considers the baseline PM10 concentration within the affected area.

The full construction dust assessment is included as an Appendix (D1) to the document and concludes that the risk of impacts for the development without mitigation are considered to be medium risk for human health from the 3 potential sources. It is therefore important that these impacts are mitigated against through the formulation and implementation of Site Specific Mitigation Measures which will be incorporated into the Construction Environmental Management Plan (CEMP) incorporating a Dust Management Plan and agreed with the LA Environmental Health Officer prior to construction commencing.

Operational Phase

The EPAUK/ IAQM 2017 Guidance has been used to determine whether a detailed air quality assessment is required. There are various criteria that will trigger such an assessment and in this case it is the development causing a significant change in LDV and HDV flows that has required a detailed assessment.

It is stated that the development will have no significant point source or fugitive emissions from industrial premises and the energy strategy is an all-electric solution meaning no combustion plant are required. Therefore a quantitative assessment of effects from road traffic emissions associated with the development has been undertaken. Pollutants considered within the scope of the report are NO_2, PM10 and PM2.5 and these will be assessed at nearest sensitive receptors. Ecological receptors have been scoped out of this assessment as no Natura 2000 sites are located within 200m of the affected roads.

The assessment uses a baseline of the existing AQ in the area using 2016 background concentrations and then predicts future concentrations with the development in place and then without development in 2020. Emissions from committed developments have been added in both future scenarios. An recognised Air Dispersion model, ADMS-Roads, has been used.

Annual mean concentrations of NO_2, PM10 and PM2.5 were predicted for 17 sensitive receptors and the % change in concentration calculated.

Concentrations of NO_2 were reported in Table D16 and generally were less than 75% of the Air Quality Standard (AQS) of 40µg/m3. However at receptor ADM08 concentrations for future scenario with development are 34.6µg/m3 which represents 86% of the AQS. The concentration without development has also been calculated at 34.46µg/m3 and so is marginally less with a % change in concentration of 0.4. This receptor is within close proximity to the A1290 however, is located in an open location which is anticipated to aid dispersion. Concentrations of NO_2 decline with distance from the road source.

The report describes the largest adverse impact as being at receptor ADM16, however from the table it would appear that it is actually at ADM15. Regardless, the % change at this receptor is calculated at 0.5% which is considered negligible by the EPUK/ IAQM Guidance.

Concentrations of PM10 were predicted and presented in Table D17. The highest concentration was reported at receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 40µg/m^3 for PM10 and therefore can be considered negligible.

PM2.5 concentrations have also been modelled and presented in Table D18. Again the highest

concentration was calculated for receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 25µg/m^3 for PM2.5 and therefore can be considered negligible.

Therefore no additional or monitoring measures are suggested for the operational phase and this phase is not considered significant in terms of the impact on local air quality.

Summary:

The scope of the assessment covers a qualitative assessment of dust impact from the construction phase and a quantitative operational phase assessments of the effects of road traffic emissions. Relevant guidance has been used in both cases to inform the method of assessment. PPRS considers that the assessment is a fair appraisal of the likely impacts of the development on air quality. The conclusions are accepted and no further information is required.

To minimise the impact on air quality from the construction phase, a condition to provide a Dust Management Plan has been recommended as detailed below. The operational phase is deemed likely to have a negligible impact on air quality and as such, no further actions are required.

Recommendations.

1. Submit and implement a Dust Management Plan for the approval of the LPA incorporating the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement.

Noise (Chapter E):

Similarly to The Air Quality Chapter of the ES, The Noise Chapter considers both the construction phase and operational phase of the proposed development. Point which required further explanation of clarification are detailed below;

Paragraph E3.2.1 considers the construction phase of the proposed development. With the exception of internal slabs and internal fit out, anticipated noise levels have been modelled.

- Are the internal slabs likely to be powerfloated?
- Modelled data/contour maps should be provided to support the predicted noise levels.

HGV movements during the construction phase have been provided by the SYSTRA (traffic consultants) and the associated noise impact on A1290 is predicted as negligible.

- Does the assessment included the significant number of vehicle trips associated with material movement (e.g. soil) offsite?
- Has the traffic data been confirmed by SCC Highways?
- Supportive data should be provided

Section E3.2.2 advises that construction significance criteria have been derived from BS5228 in accordance with the ABC method, using measured baseline noise levels. The noise criteria levels are presented in Table E9, but the process of derivation should be clearly explained.

Proposed construction hours are 07:00 – 18:00 Monday to Friday, 08:00 – 17:00 Saturdays and 07:00 – 14:00 on Sundays and Bank Holidays by agreement. Whilst the surrounding area is industrial in nature, the development site is within extremely close proximity to residential receptors. Has consideration ben given to a slightly delayed start time of 08:00, particularly for noisy activities. Prior consent should be sought from Public Protection and Regulatory Services

prior to undertaking any noisy out of hours workings. A start time of 07:00 hrs on Sundays and Bank Holidays for noise generating activities is unlikely to be considered to be reasonable.

Section E3.3.1 advises that noise from external plant has not been modelled as it has been assumed that appropriate silencing will be provided and or plant will be enclosed. This is a significant assumption since outdoor plant has the potential to generate significant levels of noise. It would be prudent to clarify an appropriate noise limit for external plant to assist in the design and selection of suitable equipment.

Predicted HGV vehicle movements per hour considered to be 5 HGV movements per hour during the day and 2 at night. It is unclear whether these figures relate to the site as a whole (this would equate to less than 1 HGV movement per hour to each unit during the day) or to each individual unit.

It does not appear that noise associated with deliveries to and from site have been considered, particularly if these take place at night. It has been confirmed that there will be no night deliveries.

Section E3.3.2 includes Table E11 which contains the calculated noise limits as a comparison against the measured background noise data. Baseline noise data is discussed in section E4. Explanation of the derivation of background noise levels at each NMP should be provided i.e. are they the arithmetic average or most frequently occurring measured level?

Reference is made in Section E5.2 to penalties due to characteristics of noise being calculated with appropriate penalties being awarded for tonality and on off characteristics. There is no discussion as to the appropriateness of an impulsivity penalty.

Section E5.3.1 considers noise model verification. Table E13 provides a comparison between measured and predicted data. The table does not include the measured levels used for this purpose, and the resulting level difference does not appear to reflect the measured levels reported in Table E8 and it would therefore be useful if the measured data could confirmed. Calculations used in the derivation of L_{day} and L_{night} should also be confirmed.

Notwithstanding the above, and whilst Table E13 indicates good correlation between measured and predicted data for NMP2 and NMP5, there is a significant amount in various in other monitoring locations, leading to uncertainty in the validity of the model. Further information should be provided to provide reassurance in this respect.

Table E14 looks at future baseline levels in 2020 and also 2020 with and without the scheme. Although the DMRB long term noise level criteria have been used as a basis for assessment, no long term comparison has been made. Whilst it is acknowledged that the proposed units will not all become operational at once, occupancy is unlikely to extend to the 15 year long term period suggested. It is therefore considered that the short term criteria level referred to in section E3.4.2 is perhaps be more appropriate.

Clearly this will have an impact on the significance assessment in E5.3.2.

Environmental Health 2nd response:- A response has been received following the re-consultation Environmental Health have confirm the development is acceptable in principle subject to suitably worded conditions. The response is covered in the relevant section of the main report.

Environment Agency

Thank you for referring the above application which we received additional flood risk information 19 March 2018.

Environment Agency Position

Having assessed the supporting information I can advise that we have no objections to proposed development subject to the following conditions:

Environment Agency Position The proposed development will only meet the requirements of the National Planning Policy Framework if the following measure(s) as detailed in the *Flood*

Risk Assessment & Drainage Strategy Ref IAMP_ONE-SYS001 16/03/2018 and *Non Technical Statement dated 16/03/2018* submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition 1 The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) Flood Risk Assessment & Drainage Strategy Ref IAMP_ONE-SYS001 16/03/2018 and Non Technical Statement dated 16/03/2018 and the following mitigation measures detailed within the FRA:

Provision of compensatory flood storage attenuations ponds A, B and C must be designed and maintained in accordance with FRA and Drainage Strategy Ref: IAMP_ONE-SYS001 dated 16/03/2018 and Non Technical Statement dated 16/03/2018 and layout and detail drawings
IAMP_ONE-SYS-HDG-Z-DR-05-023-SO/A1/PO1,
IAMP_ONE-SYS-HDG-Z-DR-05-024-SO/A1/PO1,
IAMP_ONE-SYS-HDG-Z-DR-05-025-SO/A1/PO1 and
IAMP_ONE-SYS-HDG-Z-DR-05-026-SO/A1/PO1.

The mitigation measures, as detailed in the FRA, shall be fully implemented prior to construction of the spine road and subsequently in accordance with the timing / phasing arrangements embodied within the scheme.

Reason To prevent the increased risk of flooding, both on and off site for the lifetime of the development as defined in paragraph 102 and 103 of the National Planning Policy Framework.

Condition 2 The development hereby permitted shall not be commenced until such time as a scheme for the long term management of the attenuation ponds A,B and C as detailed in the FRA and Pond Layout and Details Drawings listed above has been submitted to, and approved in writing by, the local planning authority. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme.
Reason To prevent the increased risk of flooding, both on and off site for the lifetime of the development as defined in paragraph 102 and 103 of the National Planning Policy Framework.

The comments above take into consideration the revised Flood Risk Assessment /Drainage Strategy and modelling work. The Environment Agency are satisfied that the proposed development is acceptable and complies with both National and Local Planning Policy.

A second response has been received from the Environment Agency. It confirms the original position of no objection subject to the conditions as stated above in the first response. The letter

has been updated to reflect the current plans and updated Flood Risk Assessment and Drainage Strategy.

Local Lead Flood Authority – no adverse comments to the proposed development subject to conditions and notes being imposed should planning permission be granted.

Northumbrian Water : response received and summary of comments provided below:

In making our response Northumbrian Water assess the impact of the proposed development on our assets and assess the capacity within Northumbrian Water's network to accommodate and treat the anticipated flows arising from the development. We do not offer comment on aspects of planning applications that are outside of our area of control.

Having assessed the proposed development against the context outlined above Northumbrian Water have the following comments to make:

We would have no issues to raise with the above application, provided the application is approved and carried out within strict accordance with the submitted document entitled "*Flood Risk Assessment and Drainage Strategy*". In this document it states Surface water will discharge to the River Don and to the culverted watercourse along Washington Road. Foul water will discharge at a rate of 51 l/sec into manhole 2701

We would therefore request that the following condition be attached to any planning approval, so that the development is implemented in accordance with this document:

CONDITION: Development shall be implemented in line with the drainage scheme contained within the submitted document entitled "Flood Risk and Drainage Strategy" dated "17/01/2018". The drainage scheme shall ensure that foul flows discharge to the foul sewer at manhole 2701 and ensure that surface water discharges to the existing watercourse.

REASON: To prevent the increased risk of flooding from any sources in accordance with the NPPF.

It should be noted that we are not commenting on the quality of the flood risk assessment as a whole or the developers approach to the hierarchy of preference. The council, as the Lead Local Flood Authority, needs to be satisfied that the hierarchy has been fully explored and that the discharge rate and volume is in accordance with their policy.

Second consultation response from Northumbrian Water offers no objections and proposes conditions as previously stated above.

Natural England – no adverse comments received, recommended that the council team provide the substantive response.

Second consultation response from Natural England offers no objections and recommends that the substantive response is provide by the Council Ecologist.

Ecology - initial comments have result in the applicant being requested to provide additional information.

Further clarification regarding dates of survey work is required in relation to the IAMP one site.

There are a number of discrepancies within the ecology chapter of the Environmental Statement especially regarding the classification of hedgerows. The written text infers that the hedgerows are species poor and defunct but the phase 1 habitat plan K2 shows approximately two thirds of them as native species- rich hedges and trees. Hedgerows have not been included in the table K6 that summarises baseline site habitats.

There is a need for a scaled plan to show which hedgerows will be retained as well as those to be created to fully understand the impact of the scheme on this habitat and the species associated it with them.

A phase 1 habitat survey 2017 was undertaken on the planning application site but no survey seems to have taken place on the offsetting area therefore unable to understand the true ecological value of this area prior to its use as biodiversity offsetting.

The survey work for the IAMP one site seems to take into account survey work for the whole area while useful to know this information it is unclear of the direct and indirect effects of the scheme upon species. Further detail is required to understand effects.

In relation to bats it is unclear if there are many natural features suitable for roosting and whether they are to be retained and/or lost as part of the development.

Further analysis around barn owl is required as the WYG report states that West Moor Farm is a potential nesting site, temporary roost site and an active roost site. The farm buildings are immediately adjacent to the development site. Elli scope farm at the time of the WYG surveys and the Arup surveys confirmed that barn owl were nesting at Elliscope Farm which is 350m from IAMP one. Further information is required regarding the interaction between these farm complexes for barn owl and the impacts of construction and operation on the viability of the nest sites.

The development red line to the north west of the site does abut the River Don therefore further understanding of the presence of the species within the River Don at this point and potential effects is required. Paragraph K5.2.1 states that the attenuation features do not infringe on the riparian corridor however one of the features is approximately 10m from the river's bankside and therefore further clarification is required regarding understanding the relationship between the function of these features and the river itself. Within the planning statement para 6.63 river restoration works are mentioned but not referenced in the ES Ecology Chapter, could the LPA have more information regarding this element of work.

In terms of the conclusions regarding effect on species these sections would benefit from being expanded especially in relation to bats, water vole, otter, barn owl and birds.

Further clarity is required regarding the biodiversity offset metric used to calculate the necessary area of land required to mitigate for the impacts of the development. The suggested habitat creation measures in line with higher stewardship principals seem in keeping with the species affected but this needs to be justified in accordance with the Area Action Plan. The planning statement references work undertaken by WYG regarding mitigation for IAMP one and two but this has not been referenced in the ES chapters or appended to either document.

A total of 43.6 ha of biodiversity mitigation is to be created with 4.9 ha within the application site with the remaining outside. The report states that there will be 7.3 ha of soft landscaping with ecological benefits within the site as well as 2.5 ha of aquatic habitat for biodiversity benefit which

suggests a total 9.8 ha within the site. The LPA requires a scaled plan detailing the ecological mitigation. The submitted plans for the scrapes within the north west of the site would be beneficial for wildlife; however the plans for onsite aquatic habitat as per Figure K7 do not offer the same degree of wildlife benefits. The landscaping on site is very basic and minimal coupled with the operational use of the site would question the viability of it functioning to support wildlife.

The LPA would recommend that native broadleaved species (appropriate to the area) be planted as part of any landscaping scheme coupled with a minimum 5 years establishment and maintenance period. The application would benefit from a revised landscaping scheme.

It is suggested that15ha of land is available from the outset for mitigation; a map and detail of what this will consist of is required to understand if pre and construction impacts are dealt with via this option. Clarification regarding start and finish time for these works is required.

It is understood that agreements have been made with LPA that the remaining mitigation will take place on its land and will start July 2018 and will be complete 2020 would this time table be for all the ecological mitigation work suggested or will there be a phasing plan. This information is required to help understand if it addresses the impacts as they arise through the course of the early construction and operational uses.

ECOLOGY response to addendum to Environmental Statement.

A series of notes and conditions are required to protect, mitigate and enhance the protected and priority species and habitats on and off site throughout the various phases of development in order to comply with the policies set out in the adopted Area Action Plan.

Urban Design – initial comments have resulted in the applicant being requested to provide additional information.

IAMP DRAFT DESIGN CODE

- Further consideration needs to be given to the purpose of the code and how it is to be used. Whilst we appreciate the Code is issued in draft form to guide development pending formal approval through the process of the emerging DCO for IAMP TWO, the code along with plans and illustrations need further detail to ensure its fit for purpose and SCC are in agreement with its requirements.
- Sections seem more like guidelines or principles than code. The design code should go further with a clearer masterplan, parameters plans, cross sections and illustrations and requirements to set out being stricter and more exact, and where possible opportunity to assess if a proposal complies.
- The Design Code should include mandatory and non-mandatory elements and provide a clear set of requirements to bring future development forward.
- The below applications will need to demonstrate compliance with the Design Code.

IAMP ONE DAS

- This documents purpose should be to explain how the outline proposals are a suitable response to the IAMP DRAFT DESIGN CODE and the AAP and provide the next layer of detail.

- The documents contains information that should be included in the IAMP DRAFT DESIGN CODE such as the parameter plans and not enough information is provide within the DAS to explain how the masterplan has evolved and is compliant with the IAMP DRAFT DESIGN CODE and the AAP.
- A compliancy statement should be provided, identifying where how he masterplan accords IAMP DRAFT DESIGN CODE and the AAP and justification in areas where it does not.

IAMP ONE PLOT 3 DAS

- This documents purpose is to explain how the detailed proposals are a suitable response to the IAMP DRAFT DESIGN CODE, the AAP and IAMP ONE DAS, thus providing the next layer of detail.
- Not enough information is provided with the DAS to explain how the detailed design is compliant with the IAMP DRAFT DESIGN CODE, the AAP and IAMP ONE DAS. A compliancy statement should be provided, identifying how the detailed design and justification in areas where it does not.
- The principle façade is to the north of the building and where the office is located. The external space to the south of the site will be utilised for the storage of stillages. Further consideration should be given to the buildings orientation as whilst a principle façade is provided, the location of the service area and storage on onto the boulevard A1290 a primary route create poor gateway entrance y into IAMP.
- The DAS states the use of Stillage's is vital to the operational logistics of the business and will be used and accessed on a daily basis. Further details need to be given to the height and form of the stillages.
- The building signage is on the northern elevation, again further consideration needs to be given to the south elevation and its frontage onto the gateway boulevard A1290 and the primary route into IAMP.
- In relation to landscape and boundary treatment, further consideration needs to be given to increasing the amount of screen planting and the location of the plots fencing. The IAMP DRAFT DESIGN CODE states fencing onto the boulevard A1290 and the primary route should be set behind a landscape strip to help screen the boundary.

Additional information has been submitted and no further comments have been supplied by the Design Team, the additional information is considered satisfactory and will be discussed in the main section of the report. It is recommended that conditions should be imposed should the scheme be approved in respect of materials and compliance with the Design Code/Design and Access Statement.

Landscaping - initial comments have resulted in the applicant being requested to provide additional information.

The Non-Technical Summary contains the following statement in 3.3 Landscape and Visual;

The IAMP ONE Site is located within flat, relatively nondescript farmland. The area is not subject to any statutory landscape designations and is considered to be of 'Low' sensitivity; it is a previously disturbed fragmented landscape of comparatively low scenic quality, which is commonplace throughout the wider region.

This description is rather dismissive of an area of land which could be considered to be surprisingly undisturbed and rural within the wider urban area, with young copses and hedgerows which whilst not being complete, have benefited from significant restoration within the last 25 years. The grouping of small hamlets along the winding road which crosses the River Don is unusual in Tyne and Wear. The generally flat land with undulations near the River Don and to the north offers some long distant views across arable farmland.

In national terms it is not considered a “valued landscape” but in local terms it does have positive qualities.

The table in Chapter F – Landscape and Visual Page 24 attributes the conservation Interest factor as Low /Medium value. Given the diversity of fauna on the site and the presence of wetlands I would have expected a Medium value.

The name “International Advanced Manufacturing Park” suggests a layout with a higher proportion of planted land and a better setting for the buildings than that proposed. The objective should be to provide a setting more befitting an area of land which has been removed from the greenbelt and is to set the standard for further development in the area.

Specific Comments - Layout

Reference is made to the need to mitigate for the adverse visual effects to the close proximity views on the A1290, Follingsby Lane and Downhill Lane and the three residential properties to the north of the site (as specified on page 8). Given that the landscape infrastructure strips to the north and south boundaries have to accommodate clearance for overhead electricity cables and future road widening the area left for tree planting means that the screening effect will be a lot less than, by way of example, that achieved by earlier and wider plantations planted to the south of the A1290.

The proposal would benefit from a widening of theses strips and potentially more off site planting to the north.

Within the site, the main access spine road and the north west to south east green corridor and access track do not offer much space for mature tree growth, given that they also have to accommodate, to varying degrees, enough space for Suds, footpaths and close mown verges. The end quality of the development becomes more dependent upon what can be achieved on the development plots by way of perimeter fencing and onsite landscape planting.

Again the proposal would benefit from a widening of these strips.

Specific Comments – Species and Varieties

Chapter C Site and Scheme Description C3.7 Landscaping states;

Screen planting, comprising indigenous trees and shrubs, will be established around the perimeter of the IAMP ONE site. The planting will include a percentage of Grey Poplars along with native wood species. Some Scots Pine will also be included to provide year round screening.

Grey Poplar is not native and would be unwelcome in a planting mix. The reference to it being native in the Sunderland Landscape Character Assessment is unfortunately incorrect and misleading.

Using Scots Pine for their year round screening effect compromises the wildlife value that would be achieved by using a native broadleaf mix. It is preferable to use the latter at increased depths to achieve screening.

There are relatively small areas of species rich meadows.

Chapter C Page 10 states that the green corridor will be planted with native trees and shrubs with ground cover species. The proposals show quite a lot of non-native varieties. Whilst recognising the value of some non- native ornamental tree and shrub planting in the green corridor, the proportion looks excessive. Species rich grassland with non-natives could be used to introduce more colour in combination with more native tree and shrub planting? Some evergreen trees would be welcome here.

The use of one variety for the avenue and one variety for the hedging on the central spine, whilst being visually strong, is high risk in terms of resistance to pests and diseases and climate change. More variety will increase resilience, give more seasonal interest and increase the wildlife value for foraging insects. Larger growing varieties than Carpinus betulus 'Fastigiata and 'Streetwise' would be preferable in order to reduce the visual impact of the development and for their contribution to reducing surface water run-off and providing shelter.

Establishment and Management

A five year maintenance period is required to successfully establish the proposed planting.

A maintenance programme to achieve this and outlining longer term management requirements should be provided as part of the application and funding arrangements described.

It is recommended that conditions should be imposed should members be minded to grant consent.

Landscape re- consultation response on addendum to the Environmental Statement.

Further to discussions with the Council Landscape Architect following the second round of consultations, it is proposed that all landscaping requirements shall be conditioned on both the outline and full element of the proposed development.

Built Heritage - initial comments have result in the applicant being requested to provide additional information.

This proposal will have largely negligible impacts on those built heritage assets in the City of Sunderland located within the immediate and wider setting of the site, though some additional analysis is required to enable a full assessment to be made.

The main heritage impacts concern archaeology, and the County Archaeologist will be providing detailed comments in this respect. It is important that all requisite archaeological assessment, investigation, monitoring and recording satisfies the requirements of the County Archaeologist.

Chapter G (Cultural Heritage) of the supporting Environment Statement considers heritage assets within the site and its setting, and provides a heritage impact assessment that assesses the potential effects of the proposed development on these assets. Whilst the conclusion of the

assessment that all built heritage assets will experience a neutral or minor adverse impact at worst is not disputed, it is considered that the impact assessment is lacking in detail and more specific impact analysis of individual assets should have been provided to support and fully justify its conclusion.

For example, Penshaw Monument and Hylton Castle are both grade I listed buildings of exceptional significance and major landmarks in Sunderland that can be viewed from miles around. A more thorough analysis of the impact of the proposed development on the setting of these assets should ideally be provided to demonstrate that views to and from them will not be adversely affected. In this assessment consideration should in particular be given to the current restoration and development scheme at Hylton Castle, which will soon provide public access to the roof of the castle and create high level views across the surrounding landscape, and most likely including to the application site.

The points raised above have been clarified by the applicant agents and have been addressed within the Environmental Statement and will be covered in the main agenda report.

Built Heritage – re- consultation response – no further comments

Southern Area Command – Police - no response received.

Southern Area Command - re- consultation response – no response received.

NE Ambulance Service NHS Trust – no response received.

NE Ambulance Service NHS Trust - re- consultation response – no response received.

Campaign To Protect Rural England – no response received.

Campaign To Protect Rural England - **re- consultation response** no response received..

Northern Electric– no response received.

Northern Electric - **re- consultation response** no response received.

North Gas Networks - – No adverse comments received advice to be passed onto applicant in respect to working next to utilities.

Northern Gas Networks – re-consultation response - No adverse comments received advice to be passed onto applicant in respect to working next to utilities.

Business Investment – no response received.

Fire Prevention Officer – no adverse comments received in respect of the planning application, advice for applicant is respect of Building Regulations. No further response received.

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National Grid Transco – No adverse comments received advice to be passed onto applicant in respect to working next to utilities.

South Tyneside MBC – comments received supportive of the IAMP proposal in principle, subject to additional information being secured:-

Lead Local Flood Authority: Flood Risk and the River Don

South Tyneside Council, as a Lead Local Flood Authority; must ensure that it is satisfied that there will be no increased flood risk to the borough as a result of the proposals.

It is understood that the proposals include buildings within the 1 in 100 year outline for flood zone 3 and as a result compensatory flood areas are required.

The IAMP One Flood Zones and proposed building levels Zone A1 drawing (Systra 1.12.17) highlights three compensatory storage areas. It is understood that they also serve to attenuate surface water from the development. The areas proposed are located both within and outside the flood zone however limited detail is available as to how they would function to ensure that the compensatory storage is provided and that adequate storage is available to attenuate the surface water from the development. At this moment we are therefore unable to clarify that there will not be an impact to South Tyneside based on the information submitted.

Further clarification is therefore sought on the following matters:

- How they work during an extreme flood event to provide compensatory storage i.e how the flood water from the river will be conveyed to the storage areas?

- Is it the intention that all the compensation areas provide similar flood storage volumes?

- How do the flood basins release the water back to the river? Are any controls proposed and if so what rates will apply?

- What storage volume is required for the surface water attenuation from the development? Do the basins provide storage for both the river in flood on an extreme event and the surface water storage required from 1 in 100 year event plus climate change from the development?

We note that there is likely to be consultation responses from both the Environment Agency and Sunderland City Council in its capacity as a Lead Local Flood Authority with regards to flood risk.

Highways, parking and transportation

- The Council would welcome an opportunity to further discuss the options for promoting sustainable transport both to IAMP ONE and, at the appropriate time, to the IAMP overall. It is important that residents from South Tyneside are able to access the job opportunities that the IAMP will inevitably bring by means other than a private car.

- STC would like to better understand how traffic will be managed between the local road network and the strategic road network particularly in terms of the Downhill Lane junction including the traffic signal timings.

- STC would request information on the future operation of Follingsby Lane under IAMP ONE and future proposals.

South Tyneside MBC response to re-consultation

As you will be aware, South Tyneside Council previously made a representation about the proposal on the 12th February 2018 and it included support for the proposal in principle alongside highlighting some points of detail that we wished Sunderland City Council to consider.

Having considered the additional information submitted with regards to this planning application, South Tyneside Council continues to offer its support in principle for the proposal and it would appear that the majority of the points we previously raised have been addressed. Notwithstanding the above, there are still some comments that we would wish to make and these are included in Appendix 1 and we trust that Sunderland City Council will take them into account in their consideration and determination of this planning application.

Flood Risk and Drainage

The updated flood risk and drainage proposals would appear to be satisfactory. The Council would support all of the planning conditions relative to Flood Risk / Drainage that have been identified by Sunderland City Council as a Lead Flood Authority for this application.

Highways, Parking and Transportation

The Council has reservations that the proposal will lead to increased movement conflicts at the Downhill Lane / A1290 junction outside of the planning application site and that is within the South Tyneside administrative area. This point is mentioned in the applicants Road Safety Audit – see STAGE 1/2 ROAD SAFETY AUDIT completed by Systra.

Should the development be granted, we would request that the applicant monitors the traffic movements at this junction to see what, if any, future changes might be needed to mitigate the issues. We therefore respectfully request that any approval is suitably conditioned to take this material planning consideration into account. Discussion have taken place with the applicant and it has been agreed that a condition will be imposed, should members be minded to grant consent.

Gateshead MBC – Thank you for consulting Gateshead Council as an adjoining authority regarding the above planning application (reference : 18/00092/HE4) that is currently being considered by Sunderland City Council.

Gateshead Council wish to provide some comments in relation to the transport and flood risk/River Don aspects of the proposed development that we trust will constructively support Sunderland City Council in their assessment of the planning application.

Gateshead Transport Comments

Gateshead Council has made a number of representations to Sunderland and South Tyneside Councils in respect of IAMP, including appearance at the Examination in Public for the Area Action Plan. Transport comments have focused on a desire to ensure that public transport access to IAMP from Gateshead, and the wider Tyneside area, via provision of a service to Heworth Interchange. This approach was supported by the Inspector and is evidenced in the approach set out in the adopted AAP.

We feel strongly that this approach has not been carried through to this application. In reading both the Transport Assessment (ref IAMP_ONESYS002) and the Transport Assessment Addendum (ref IAMP_ONESYS003A), the Council appreciates that the provision of a full public transport solution for the full site may not proportionately fall wholly on IAMP One.

However, IAMP One represents around 40% of the overall site area and may accommodate up to 44% of the overall number of jobs provided by IAMP overall; on this basis the provision of four bus shelters is itself not proportionate in terms of the approach set out in the AAP.

Also, while IAMP One may not deliver the full transport solution, there is no reason why a staged comprehensive approach to public transport provision across the full development profile could not be presented at this stage, and the Council would echo the Highways England recommendation that a Public Transport Strategy for IAMP as a whole be submitted and approved prior to the occupation of any units in order for them to demonstrate how IAMP One fits in to the overall approach and that there is sufficient provision to ensure adequate modal choice.

In line with this, discussion of options for public transport provision, both at the Examination in Public and subsequently, have included the potential for Follingsby Lane to provide a bus route through the development and onwards to Heworth. The development of a Public Transport Strategy will need to consider this issue and therefore the provision of a Traffic Regulation Order prohibiting motor vehicles on Follingsby Lane (also set out in the Transport Assessment) could be seen as pre-judging that work. The Council would like confirmation that that is not the case.

Gateshead Flood Risk / River Don Comments

It is essential that the proposal integrates adequate compensatory storage and a sustainable drainage system which takes into account the impact of climate change, which can manage the interaction of fluvial and surface water flooding effectively, to ensure no increase in flooding downstream of the IAMP; and opportunities for ecological enhancement of the River Corridor are maximised, consistent with the River Don Partnership's Vision.

The comments from Gateshead Council in respect of highways, public transport and drainage have been assessed and addressed in the main agenda report.

Gateshead MBC – No further comments have been received.

The comments raised by both Gateshead and South Tyneside have been addressed in the comments section of the report under the respective headings.

Director of Health – The Health Impact Assessment is a good and thorough piece of work offering an honest and realist assessment of the likely scope and duration of impacts both positive and negative. Negative impacts are mostly minor and short lived (i.e., limited to the construction phase) whilst the positive impacts of whatever size are for the longer term. Mitigations suggested appear to be appropriate and reasonable. In most cases health or mitigation against health risk have been designed or planned in. Compliance with the stated approaches would be paramount.

I would just want to add one minor issue, if possible. I do not know if it is within the remit of this process, but I would ideally like to have a condition placed on this development that there should be no smoking shelters on this site. I would expect that this would be most relevant in the operational phase. Given our high levels of smoking in the City, this would help to mitigate any issues relating to lung cancer and CVD at the population level.

The benefit of designing in a community hub and/or liaison function has the potential to mitigate even further than what is described in the report. Good communication and engagement with the local community, alongside messages about the longer term benefits, could help to address the potential reduction in physical activity and active travel. It would also provide a point of contact that we could use to hook in additional targeted support. Early engagement from a range of public

health commissioned services and Active Sunderland, and for health protection messages would potentially reduce some of the negative impacts.

We have no major concerns but I have copied Charlotte in as we would suggest that we prepare some targeted support for the surrounding areas during the construction phase as she may wish to consider this from an Area Arrangements perspective.

Director of Health – no further comments submitted

Health and Safety Executive – no adverse comments received via the HSE online portal.

Tyne and Wear Archaeology Officer – no adverse comments have been received, how conditions should be imposed should members be minded to grant consent. No further comments received following the re-consultation.

The County Archaeologist has reviewed the submitted report and a summary of the report and findings is set out below: The County Archaeologist comments are going to concentrate on buried archaeology. The County Archaeologist has not commented on the setting and visual impact on nearby designated heritage assets (such as Hylton Castle which is Scheduled and Hylton Grove Bridge which is grade II listed), this will be assessed by the Council Built Heritage Protection Team.

The County Archaeologist has confirmed the following archaeological work have been undertaken:

- Cultural heritage assessment by Golder Associates
- Air Photo and LiDAR interpretation by Alison Deegan
- Archaeological monitoring of geotechnical trial pits by Archaeological Services Durham University
- Geophysical survey by Archaeological Services Durham University
- Evaluation trenching by Archaeological Services Durham University
- Topographical survey of ridge and furrow earthworks by Archaeological Services Durham University

There are three known archaeological features within the IAMP ONE site:

- The former Pontop and South Shields branch of the Stanhope and Tyne Railway – now built over by the A1290 road
- Decontamination unit for RAF Usworth – all that survives is the concrete base
- The site of a barbed wire barricade associated with RAF Usworth – has since been removed

The archaeological monitoring of ten geotechnical test pits revealed no archaeological remains.

Geophysical survey identified ridge and furrow and possible soil filled features.

The geophysical anomalies were investigated through evaluation trial trenching in December 2017. No significant archaeological remains were found. The County Archaeologist has reviewed all the submitted information and has recommended that conditions should be imposed should members be minded to Grant Consent for this hybrid application.

Archaeological work required:

Archaeological watching brief during the construction of the proposed surface water drain east and south of the A1290 (because this element of the scheme has not been archaeologically evaluated).

Archaeological Watching Brief Condition

No groundworks or development shall commence on the surface water drain, east and south of the A1290, until the developer has appointed an archaeologist to undertake a programme of work set out in a specification provided by the Local Planning Authority. Before development commences the route of the surface water drain shall be topsoil stripped by the appointed archaeologist in order that any archaeological remains can be recorded and where necessary, archaeologically excavated. The appointed archaeologist shall then be present at relevant times during the undertaking of the developer's groundworks with a programme of visits to be agreed in writing by the Local Planning Authority prior to groundworks commencing.
Reason: The site is located within an area identified as being of potential archaeological interest. The observation is required to ensure that any archaeological remains on the site can be preserved wherever possible and recorded, and , if necessary, emergency salvage undertaken in accordance with paragraph 141 of the NPPF, Draft Core Strategy Policies E4 and E5 and saved Unitary Development Plan Policies B11, B13 and B14.

Archaeological Watching Brief Report Condition

Within six months of the completion of the archaeological work, the report of the results of archaeological work pursuant to condition (Insert condition number) shall be submitted to and approved in writing by the Local Planning Authority.
Reason: The site is located within an area identified as being of potential archaeological interest. The investigation is required to ensure that any archaeological remains on the site can be preserved wherever possible and recorded, to accord with paragraph 141 of the NPPF, Draft Core Strategy Policies E4 and E5 and saved Unitary Development Plan Policies B11, B13 and B14.

Tyne and Wear Archaeology Officer – a response was received and no further comments have made and no additional conditions requested.

Neighbour Representations:

A total of eight letters of representation have been received to the proposed development: 1 in support (Nissan) of the application 4 objecting to the scheme (3 Letters from Hedley Planning Services, 2 from Barton Willmore, 1 from Plantlife and 1 from the British Horse Society).

Letter of support from Nissan Motor Corporation

Nissan Motor Manufacturing United Kingdom (NMUK) wishes to express its support for the planning application submitted by Henry Boot Developments Limited (HBDL) for the IAMP One Project. NMUK has been liaising with HBDL and IAMP LLP, as part of the progression of the IAMP project, and welcomes the work undertaken by them to create the opportunities for the automotive supply chain to be located adjacent to our key European manufacturing facility at Sunderland

The Sunderland plant has been selected, [subject to compliance with business conditions], to build the new models of the Quashi and X-Trail, in addition to previous announcements regarding the new Juke Model to be built at the plant, and our continuing production of both the new leaf model and Infiniti range.

The creation of IAMP, through this comprehensive and planned approach, is key to the long term operations on NMUK, facilitating the availability of the land and manufacturing buildings for the supply chain to locate within minutes of the Sunderland plant. We have liaised closely with Henry Boot and IAMP LLP to ensure that IAMP One has the capacity to address the immediate priority supply chain requirements for the new Qashqai and X Trail models over the next production period. The project will enable the construction of buildings and infrastructure in a timescale that meets the requirements of our production process and IAMP ONE is therefore important component in delivering immediate growth and investment.

In the long term, NMUK will continue to support HBDL and IAMP LLP with the wider IAMP project through the Development Consent Process for IAMP TWO. The appointment of HBDL and the creation of IAMP LLP provide us with the confidence in the long term structure for the delivery and management of IAMP, in accordance with the comprehensive approach set out in the IAMP Area Action Plan and Highways England. The interest of the region and the continued growth and strength of the automotive sector in the UK will benefit from the coordination and planned environment created at IAMP.

Eights letters of representation have been received.

Barton Wilmore on behalf of the Church Commissioner for England

We write to you in connection with the above planning application which has been submitted on behalf of Henry Boot Developments Ltd and which proposes an employment led scheme on land north of the Nissan Car Plant at Washington. This is intended to form part of the emerging International Advanced Manufacturing Park ("IAMP").

Our client, the Church Commissioners for England ("the Commissioners"), owns land to the north of the planning application site which is also identified to form part of the wider IAMP development and in this respect, they have actively taken part in process to bring forward the IAMP to date. This includes participation in the plan-making process by their involvement in the now adopted IAMP Area Action Plan ("IAMP AAP"), as well as ongoing discussions concerning the related Development Consent Order ("DCO").

The process of bringing forward the IAMP has been recognised as a development of national importance; especially its relationship to the neighbouring Nissan Car Plant and its associated supply chain. This is confirmed by its status as a Nationally Significant Infrastructure Project ("NSIP"). We know from our experience in promoting other Advanced Manufacturing Parks elsewhere in the country that when brought forward in the right way, they are significant economic drivers and in this respect the Commissioners have broadly supported the emergence of the IAMP in this area of Sunderland and South Tyneside.

We note that the submitted hybrid planning application seeks only to bring forward an element of the IAMP and is being labelled as 'IAMP ONE'. Whilst the Commissioners wish to see the IAMP come forward to assist in the economic development of the area, it has significant concerns regarding the form, nature and process of the IAMP ONE planning application and therefore wishes to register its initial objection to this hybrid planning application.
Having been involved in process of getting the IAMP AAP in place, the Commissioners understand the complex nature of developing the project in terms of providing the required infrastructure to support the development and the need to plan the IAMP in a comprehensive manner so there is certainty that the development as a whole can be delivered and that the benefits of the project are maximised. In this respect paragraph 3 of the adopted IAMP AAP is quite clear that:

"The IAMP Area Action Plan (AAP) is a policy framework to guide the comprehensive development of the IAMP. The AAP sets out planning policies to direct and enable the comprehensive development of a high quality employment site which is targeted at automotive and advanced manufacturing end users, and their supporting facilities."

This need to plan and deliver IAMP comprehensively is repeated in paragraphs 7, 12, 42 and 75 of the IAMP AAP and in Policy S1.

The Commissioners' initial concern is that the IAMP ONE proposals are not consistent with this and in contrast seem to represent a piecemeal and selective approach to development where it is unclear as to the logic of why this portion of the wider IAMP site has been chosen. Indeed, it appears that the boundary has been conveniently based on land ownership (rather than planning or design rationale) and seeks to avoid the significant investment in infrastructure that would be required in bringing forward the wider IAMP site (namely relating to highways). This seems contrary to Policy DEL1 of the IAMP AAP which requires the development of the IAMP to clearly map out the provision of infrastructure in a comprehensive manner and paragraph 82 which seeks to prevent piecemeal development of the IAMP.

Given that this and the fact that the application attempts to move forward ahead of any DCO process, it is also unclear as to how this will relate to later phases of IAMP and how the scheme is able to tie this together to ensure IAMP is delivered in an integrated, whole and complete way.
In light of these initial concerns and objections that we have raised, we reserve the right to comment further on the planning application and its associated technical documents in due course.

As the objection raise matter of the principle of development and comprehensive nature of the development theses area will be addressed in the main section of the report.

Barton Wilmore 2nd Letter of Representation received 10th May 2018.

We write to you in connection with the above planning application which has been submitted on behalf of Henry Boot Developments Ltd and which proposes an employment led scheme on land north of the Nissan Car Plant at Washington. This is intended to form part of the emerging International Advanced Manufacturing Park ("IAMP") and is referred to as "IAMP One".

Our client, the Church Commissioners for England ("the Commissioners"), owns land to the north of the planning application site which is also identified to form part of the wider IAMP development and in this respect, they have actively taken part in the process to bring forward the IAMP to date. This includes participation in the plan-making process by their involvement in the now adopted IAMP Area Action Plan ("IAMP AAP"), as well as ongoing discussions concerning the related Development Consent Order ("DCO").

We have previously written to you on 9 February 2018 to outline our initial concerns and objections regarding the above planning application. We note that the applicant responded to our letter on 15 March 2018. Since this time, additional information has been submitted to support the planning application. This letter seeks to elaborate on our initial objection letter and take into account the Applicant's response on a number of issues.
We detail our concerns below.

1. Consistency with the International Advanced Manufacturing Park Area Action Plan
Whilst it is acknowledged that a letter issued by the Secretary of State on 4th December 2017 under Section 35 of the Planning Act 2008 effectively removes IAMP One from the DCO process,

we do not agree that this presents the applicant with a 'free hand' to submit a standalone application such as that which is proposed.

Irrespective of whether IAMP One forms part of the wider DCO process or not, it does fall within the boundaries of the IAMP AAP and as such, it needs to comply with its policies and its overall strategy.

As set out in our initial objection to the planning application, paragraph 3 of the adopted IAMP AAP is quite clear that:

"The IAMP Area Action Plan (AAP) is a policy framework to guide the comprehensive development of the IAMP. The AAP sets out planning policies to direct and enable the comprehensive development of a high quality employment site which is targeted at automotive and advanced manufacturing end users, and their supporting facilities."
This need to plan and deliver IAMP comprehensively is repeated in paragraphs 7, 12, 42 and 75 of the IAMP AAP and in Policy S1.

Whilst the response from the Applicant highlights that IAMP One has formally been removed from the DCO process (through the S.35 letter) it does not adequately explain how, as a standalone application, it seeks to plan for comprehensive development of the wider IAMP.

The Applicant's response refers to a draft Design Code submitted with the planning application. Whilst this provides an indicative outline of how IAMP One will sit within the wider IAMP development, it falls short of explaining how infrastructure between the two will be addressed and does not give any reassurances that IAMP One will not prejudice the wider IAMP development. Instead it simply outlines a broad overview of the scheme which we consider does not fully address the requirements of the IAMP AAP and its policies.

Similarly, the accompanying Planning Statement contains only a small section on undertaking a comprehensive approach. It states that IAMP One will not prejudice the delivery of the wider IAMP site because of the following measures:

• Reserving land for the future widening of the A1290;
• Providing a dual carriageway connection to the north west which can be extended in the future through the Southern Development Area and into the Northern Development Area; and
• Ensuring the amount of ELMA land required for the offsite mitigation for IAMP One is the minimum area necessary. This is required to ensure that sufficient land remains to mitigate the effects of IAMP Two.

However, given our analysis below, the Commissioners are doubtful that a robust assessment has been undertaken to establish fully that these measures alone can ensure that the delivery of IAMP Two is not fettered in any way.

A statement (by the applicant) confirming that IAMP One will not be prejudicial to the delivery of the wider IAMP site is not, in the Commissioners' view, a sufficiently robust basis on which to determine a planning application. The AAP requires a comprehensive approach to the development of the IAMP and this is not achieved by the current application's apparent lack of consideration of impact on IAMP Two.

The Transport Assessment Addendum (March 2018) states that "IAMP ONE is only the first phase of development at IAMP." – this is a view that pervades the entire application. If IAMP One is indeed being treated as a 'first phase' then the application simply must consider the potential impacts and interactions with later phases if the proposal is to accord with the policies and

objectives of the AAP. The Commissioners believe that the current application fundamentally fails to do this and therefore, firstly, the overall principle of development cannot be established on the site and, secondly, it cannot be proven that the emergence of IAMP One will not prejudice the future development of the wider IAMP. We consider some specific elements of this further below.

2. Consideration of Biodiversity Offsetting

The Environmental Statement that accompanies the planning application submission highlights that IAMP ONE is able to mitigate its own impact either through on-site measures or thorough adjacent land within the Applicant's control. This is particularly the case when it comes to ecology, where land outside the application's red line boundary is proposed for biodiversity offsetting.
For the Commissioners, this raises several fundamental points. The area for offsetting is clearly required to mitigate the impact of IAMP One and the revised Chapter K of the Environmental Statement states that the 43.6ha offset area is in the Applicant's control (being beyond the red line boundary of the planning application). However, the chapter confirms that only 15ha is currently available, with the remainder being made up of two land parcels which will be available at the end of June and August 2018. Without this land the proposed development cannot come forward, yet no evidence has been provided by the applicant to categorically confirm when this land will become available. Therefore, given its importance to the biodiversity mitigation, it is critical that evidence of the ownership position is provided by the applicant and that the delivery of the off-set area is secured via legal agreement.

Related to this point is the wider consideration of the offsetting land in relation to the wider IAMP development. Given the land sits outside the Applicant's red line, it is imperative that it is understood how this land ties in with IAMP Two and whether it is also required as offsetting for the wider IAMP development and how this may also be achieved. This is especially important given that the IAMP Two land falls within the DCO process.

It is also noted that the land is currently in use for agriculture and it is understood that it will continue to remain in agricultural management after development is completed in accordance with environmental stewardship principles. The Applicant has not been clear in its submission on how the land can be used for offsetting whilst remaining in agricultural management and whether the two are indeed compatible with each other.

The Commissioners therefore have strong doubts whether the offset area can firstly be delivered as part of this planning application and second, actually provide the biodiversity enhancement that is required by adequately offsetting the loss of biodiversity on the application site. There is also no explanation as to how the offsetting is to tie in with the wider IAMP development, which may also require this land for offsetting/mitigation.

Given these concerns, the Commissioners continue to object to the scheme on these grounds given that it is unclear whether on this basis that the Applicant can mitigate successfully the development proposals and so the application fails when assessed against Policy EN2 of the IAMP AAP.

3. Consideration of Other Mitigation

Further issues have been raised concerning proposed mitigation in relation to other elements of the proposed development and how these could potentially prejudice the ability of wider IAMP site to be delivered. Within the Applicant's response to our initial objection, little reassurance is given as to the ability to demonstrate how IAMP One and the wider IAMP development can effective join up with regards to mitigation and infrastructure provision; rather the letter simply confirms that

mitigation solely focusses on IAMP One and its delivery. We examine some of the specific issues below.

Highways

Whilst the Applicant is keen to highlight the proposed mitigation works which will be delivered through IAMP One, this does not explicitly explain how this then seeks to integrate with the wider IAMP development.

Indeed, the IAMP One Transport Assessment ("TA") (and its March 2018 Addendum) explicitly does not take into account the wider IAMP development at all. Whilst the Applicant's response to this is that it is not appropriate to consider the wider IAMP in its TA, as this will need to be subject to significant highway mitigation which will influence how traffic routes on the network, we do not deem this reasoning adequate in any way. In fact, the Commissioners are concerned that instead of seeking that the whole IAMP is able to come forward with sufficient mitigation and infrastructure provision, the Applicant instead states that IAMP Two will have to take into account IAMP One as a 'committed development'. This fundamentally shows a disjointed approach to the wider IAMP development and the Applicant's approach clearly conflicts with the adopted IAMP AAP and most notably Policy T1 which calls for a comprehensive approach to the provision of highway infrastructure.

The IAMP AAP is part of the adopted statutory development plan and is intended to guide development on the entire IAMP up to 2032. The operation of the surrounding highway network during a future design year of 2028 is discussed within the TA submitted for IAMP One, without giving any due consideration to the traffic generating potential of the remainder of the IAMP site. Indeed by 2028 it is anticipated that the wider IAMP site will have been largely developed by this point (including infrastructure improvements). Given the adopted status of the AAP we are somewhat surprised that the TA does not consider this at all.

Consequently, from a highways point of view, there are no reassurances that the mitigation proposed in IAMP One will not prejudice or frustrate the delivery of the wider IAMP development and so the Commissioners continue to object to the IAMP One application on these grounds.

Flooding and Drainage

As part of the IAMP One submission, the Flood Risk Assessment undertaken in support of the planning application acknowledges that ground levels need to be raised in order to protect against 1 in 100 year flood events (plus climate change).

The application submission acknowledges that this work will have impact in relation to other areas within the AAP boundary and that further flood mitigation measures will be required for those parts of the site. It is acknowledged that these areas are in third party ownership but can be picked up during the DCO process. However, this may mean such work cannot be concluded until the DCO is in place. This would then clearly have implications for the delivery of IAMP One as it appears that it will have a flood impact on the wider AAP site and on land which the applicant currently does not control. Again, little thought has been given as to practical implications of flood risk and drainage and how IAMP One and the wider IAMP site can tie together and be brought forward in a deliverable manner.

In a similar manner to the Commissioners' concerns regarding highways, until more details are provided in terms of the delivery of wider drainage infrastructure, the Commissioners maintain their objection to IAMP One of these grounds.

4. Planning Appeal by Town End Farm Partnership

We are also aware of the current planning appeal submitted by the Town End Farm Partnership ("TEFP") in relation to other land within the IAMP AAP boundary. This is ongoing, and it is noted that the Planning Inspectorate has written to the Appellant to request further information is provided with respect to certain aspects of their submitted Environmental Statement.

In particular, the Planning Inspectorate has requested that the likely significant cumulative effects of the proposals on the wider IAMP is provided as well as impacts on nearby key junctions where there are proposed improvements being put forward under separate NSIP schemes (A19 Testo's Junction and Downhill Lane Junction).

Local Planning Authority comment: There are sections submitted as part of the Environmental Statement which covers cumulative impacts, ecological and transport.

The Commissioners' view on this is that any development in the IAMP AAP boundary should be required to take into account the wider IAMP development (as part of the Development Plan). This avoids the issue of piecemeal development and ensures all relevant components of the IAMP can join-up and the relevant wider infrastructure be provided.

Given that this is the view of the Planning Inspectorate, we believe this requirement should equally apply to the IAMP One application given that it is also within the IAMP AAP boundary. Currently on key issues such as highways and ecology, there is no clear indication as to the detailed cumulative effects and whether the mitigation offered will prejudice future delivery at the IAMP.

Local Planning Authority comment: All statutory and non-statutory consultees are in full support of the application as detailed in the main section of the report.

This to us reinforces the view that a further assessment of the implications on the wider IAMP proposals should be included in the IAMP One application.

5. Revised Planning Application Documents

The applicant submitted a series of updated documents and addendums in April 2016 to address comments raised by consultees and Officers, and to address revisions to the detailed proposed for Plot 3. These included:

- Environmental Statement - Revised Chapter I – Water Resources and Flood Risk (including a Revised Flood Risk Assessment and Drainage Strategy)
- Environmental Statement - Revised Chapter K Ecology and Biodiversity
- Environmental Statement – Revised Chapter L - Access and Transport (including a Transport Assessment Addendum)
- Outline Construction Management Plan
- Applicant Response Letter to Comments made by Urban Design Officer on compliance with IAMP AAP and Design Code
- Revised Plot 3 Design and Access Statement; and
- Revised Plot 3 Drawings.

On review of these documents, particularly those relating to the Environmental Statement, it is clear that the impact of the IAMP One development on the wider IAMP project has not been considered. No reference is made in any of the documents on the potential for the development and mitigation proposed as part of IAMP One could impact on the future development of the wider

IAMP site. It is the Commissioners view that this is a fundamental shortcoming which is out of accord with the policies of the AAP

.

It is noted, however, that references to IAMP Two are made where it appears to be beneficial to the applicant. For example, the updated Flood Risk Assessment uses the area of the wider IAMP site (circa 150ha) to generate greenfield run-off rates which results in a lower estimated greenfield run off value than if a run off rate had been generated for each development area within the wider IAMP site. This appears to be in direct conflict with statements made elsewhere on the need to account for IAMP Two. For example, the Transport Assessment Addendum states:

"IAMP ONE is only the first phase of development at IAMP. It is neither necessary, proportionate nor reasonable for IAMP ONE to provide public transport routes across the entirety of IAMP at this stage."

It is the Commissioners' view that a consistent approach should have been taken throughout the application in terms of the way in which IAMP Two was considered as part of the assessments undertaken.

Within the submitted documents, a number of references are made to future management and monitoring and the Commissioners trust that these measures will be secured by condition or legal agreement. These include inter alia:

- Monitoring operational trip generation rates to ensure that these remain within the parameters assessed in the TA (and the ES);
- Ensuring that the commitments (wider public transport connectivity and the use of the east-west link) made in paragraphs 5.4 and 5.5 of the 'Transport Assessment Addendum' are delivered through the IAMP Two DCO;
- Securing an appropriate and effective governance structure for the Traffic Management Working Group
- All conditions requested by Highways England in their response to the application, including the latest response of 26th April 2018 which states that a number if the issues raised by Highways England remain unresolved.

Given the levels of mitigation proposed, it is suggested that the applicant is required by the Council to produce a 'Schedule of Mitigation' for the entire application. This document should set out an overview of the main mitigation measures proposed and setting out how, in each case, these will be secured (whether by condition, legal agreement, or through the future DCO).

6. Summary and Conclusions

The Commissioners remain of the view that the IAMP One scheme conflicts with the fundamental aims on the IAMP AAP which seeks to bring forward the IAMP in a comprehensive and joined-up manner. The rationale for a joined-up approach is clear, as it allows the required mitigation and infrastructure to be provided in a comprehensive manner which means that early elements of the development do not impinge or prejudice the delivery of future phases.

The current approach to IAMP One manifestly fails to take this comprehensive approach and is instead piecemeal in nature. In respect of key issues (ecology, highways and drainage) it is unclear as to how IAMP One takes into account IAMP Two and does not prejudice its delivery. It is also unclear how the mitigation proposed for IAMP One will affect the ability to deliver any required mitigation for IAMP Two. Given that IAMP Two is a development of national significance (being designated as an NSIP), its delivery is critical and it is important that the wider IAMP is not fettered in any way.

As the IAMP One application cannot demonstrate this, the Commissioners continue to object to it.

We trust that the Council will seek clarification from the applicant on the issues raised and will ensure that these are robustly assessed in the decision-making process.
We reserve the right to comment further on the planning application and any further revisions to its associated technical documents.

The issues raised in the further representation are covered within the main report. Members are reminded that each application should be judged on its individual merit.

Local Planning Authority comment: All comments raised above are covered in the main report and the Council is satisfied that the development is compliant with relevant local and national policies and the development purposed does not undermine the comprehensive development of the IAMP site..

British Horse Society

Having viewed the application I would point out how very confusing it is to deal with an outcome application and the application for the hybrid unit albeit they are interlinked.

I am pleased to see included in the planning statement

1 Page 37 – Policy L10 (countryside recreation) where reference is made to "improving and extending the network of footpaths and bridleways and cycle ways.
2 Page 58 1st bullet point quotes " a number of measures area proposed to ensure that pedestrians, cyclists and public transport, as well as horse riders, can access or travel through the site safely".
3 Page 58 2nd bullet point " Good quality links for pedestrians, cyclists and horse riders are proposed between IAMP One and the surround area, with new links integrated with the existing network

However, I must object to the application as they stand for the following reasons.

1 With reference to the 3 points above, the existing networks for pedestrians, cyclists and horse riders is changing drastically due to the Downhill Lane Junction improvements, new safe links must be provided from IAMPs to the network proposed in this project

2 Design and access statement – Page 5 Policy T2 Walking, Cycling and horse riding- ensure that new highway works are designed to safely integrate potential and cycle movements (no mention of horse riders at all in the following text) – BUT the new spine road severs Follingsby Lane – measure must be taken to ensure that safety of all users including horse riders.

Construction Traffic Management Plan – Follingsby Lane Planner access for construction traffic – there is a need to review the steps necessary to ensure the safety of non-motorised users of this lane – the developers must include details on the CTMP of approval is granted.

The concerns of the British Horse Society will be addressed in the highway section of the report. The proposed Downhill junction is a project by Highways England and as such cannot be a material consideration in the determining of the IAMP One planning application.

The comments raised by the British Horse Society have been addressed under the Transport and Accessibility section of the main report.

No further representation has been submitted following the re-consultation.

Plant Life International

I am writing on behalf of Plantlife International, the UK's leading wild plant conservation charity. We are concerned that the air quality impacts of the proposed development on a nearby European Special Area of Conservation have not been adequately considered.

This major development would significantly increase atmospheric NOx emissions, both from the site and from increased traffic on the A19 which passes closer to the SAC. These emissions have the potential to adversely affect the condition of the Durham Coast SAC by increasing nitrogen deposition beyond acceptable levels. Application of precautionary principle under the Habitats Regulations requires that a full assessment of these potential impacts be carried out as part of the planning process.
.
This SAC is "the only example of vegetated sea cliffs on magnesian limestone exposures in the UK. [...] Their vegetation is unique in the British Isles and consists of a complex mosaic of paramaritime, mesotrophic and calcicolous grasslands, tall-herb fen, seepage flushes and wind-pruned scrub. Within these habitats rare species of contrasting phytogeographic distributions often grow together forming unusual and species-rich communities of high scientific interest." (JNCC) The species present are sensitive to excess nitrogen and this suggests that air pollution is likely to have an adverse effect on the SAC: http://jncc.defra.gov.uk/protectedsites/SACselection/sac.asp?EUcode=UK0030140 .

On behalf of Plantlife International, I urge Sunderland City Council to ensure that a full, expert assessment is carried out of potential adverse impacts of air pollution from the proposed development and associated road traffic, to inform any decision regarding the planning application. This will ensure proper protection of a unique wildlife habitat and part of the wider natural environment which is highly-valued by local people.

Response to representation

The Area Action Plan adopted in November 2018 set out on page 13 paragraph 3.4 the Sustainability Appraisal and Habitats Regulations Assessment.

Paragraph 47, 48 and 49 of the AAP states “The IAMP AAP was subject to a Sustainability Appraisal (SA). This comprises the Strategic Environmental Assessment (SEA) and the SA of economic and social effects (including the Equality Impact Assessment and Health Impact Assessment). The role of an SA is to promote sustainable development by assessing potential alternatives to help achieve the necessary environmental, economic and social objectives.

48. The SA is a statutory requirement and is built on the SAs developed for each Council’s development plans. It covers the options for the location of the IAMP, issues and options for the main spatial layout of the IAMP AAP and the options within the policies and proposals.

49. Independently to the SA process, a screening exercise was carried out to determine whether there was a need for a Habitat Regulations Assessment. This process concluded that a Habitat Regulations Assessment was not required.”

The proposed development has been assessed both by Natural England and the Council Ecologist and such no Habitat Regulation Assessment is required to support of the submission of this application.

Two independent survey have been carried out on the IAMP One planning application boundary and the Local Planning Authority can confirm there is no magnesian limestone present .

No further representation has been submitted following the re-consultation.

Hedley Planning on behalf of Mr Razaq

Letter one received 12th February 2018

This objection is submitted on behalf of Town End Farm Partnership Limited ("TEFP").

TEFP instructed their consultant team to review the Lichfields submission package for the above hybrid planning application for 'IAMP One' (the "Application"). Below we set out our serious concerns and objections to the Application.

OBJECTION LACK OF TRANSPARENCY AND FAILURE TO FOLLOW DUE PROCESS

As Sunderland City Council (the "Council") is aware we have previously made known that the consultation exercise undertaken for the Application was inadequate.

This is particularly concerning given that the Application is for a scheme submitted by Henry Boot Developments Limited ("HBD") on behalf of and funded by a public body (the Council backed partnership known as IAMP LLP) for determination by the same authority. Being judge, jury and executioner for a "nationally strategic project" is legally questionable and demands a high level of accountability and transparency. Putting the applicant name as HBD does not preclude the Application being handled in a proper manner by an appropriate body. We raised concerns over transparency and will be pursuing a request for the Application to be called in by the Sectary of State.

The Local Planning Authority has followed due process in the consideration and determination of the application.

It is also apparent the Application is piecemeal and contradictory to the "comprehensive development" route embraced by the Council at the Examination in Public ("EIP") for the International Advanced Manufacturing Park Area Action Plan ("IAMP AAP").

The Application site falls within the IAMP AAP boundary and is therefore subject to the IAMP AAP policies which seek to deliver comprehensive development of IAMP by way of a Development Consent Order ("DCO").

Instead, the Application seeks full planning permission for only one unit. We understand that this reflects the fact that there is only one Tier One supplier interest and that is from SNOP. The remainder of the proposals are submitted in outline only which reinforces our earlier objection during the consultation period which identified that the justification for IAMP One was overoptimistic and the Application before us is speculative.

Great play was made both in the local and regional press and at the consultation event within the

documents that there were at least ten Tier One suppliers interested in locating in the IAMP One scheme.

This simply has not materialised and the Application indicates that this submission is made to serve only to prevent the delivery of units on TEFP's land in an anticompetitive
manner. That is to say that public money has been intentionally diverted to engineer a favourable position for the Council for land that it owns to be developed.

We consider that the Council has a clear conflict of interest in relation to the Application. The Council is the land owner, the effective applicant (via HBD and IAMP LLP), and the determining authority. We therefore consider that the Application should be referred to the Secretary of State and determined jointly with the development proposals for the TEFP land.

We make the following observations:

1) The TEFP site on the east side of the A1290 was refused planning permission and is now subject to a planning appeal. Our client's site provides the same opportunities to achieve the same objective as IAMP One but was refused permission on prematurity grounds. You can understand our client's frustration that the Council has removed the IAMP One land from the DCO masterplan and finds it expedient to submit a planning application.

2) The emergence of IAMP One as a suggested scheme confirms that the early delivery of units to meet the immediate and shortterm demand can only be delivered via a planning application.

TEFP has always promoted this approach. However, the principle of seeking planning permission for development on TEFP's land was rejected by the same Council that now seeks planning permission for development on its own land. This evidences a glaring lack of fairness and consistency in the Council's approach.

3) The TEFP site is now outside of the green belt after the adoption of the IAMP AAP, and it is the best located site. Given the impacts of the Application proposals (discussed below) the applicant has erred in failing to consider the TEFP site as an alternative.

4) The timely development of the TEFP site is not constrained by matters such as existing ground conditions, and the development of the TEFP site would contribute proportionately to the comprehensive development of an IAMP masterplan.

5) The mitigation proposed in the Application (for example the ecology and drainage) is within the DCO / IAMP Two boundary. The mitigation involves operational development including the construction of ponds for balancing and ecological mitigation. In the context of TEFP's development proposals, the Council has consistently taken the view that any development within the DCO / IAMP Two boundary must come forward as part of a DCO. As such, it is not apparent how the Application scheme will deliver mitigation land.

6) The proposed quantum of development for IAMP One cannot be delivered within the existing infrastructure and strategic road network capacity. As such, the proposals will be significantly delayed until the required infrastructure is built out and complete.

7) No evidence has been presented to prove that there is “actual” demand from occupiers for an IAMP One scheme. The proposal is essentially for speculative development, and in our opinion this means that buildings will need to be significantly altered in the future, further delaying the delivery of development.

It is considered that the Council has engineered a favourable position where it will be determining its own Application for development on a site which is in direct competition with the TEFP land for a similar application which was recently refused and is subject to an appeal. For transparency and fairness, this Application will be requested to be referred under separate cover. We would expect a thorough exercise to have been carried out to not only explain the planning application route for this Application, which is contradictory to the comprehensive DCO route espoused at the EiP, but to also acknowledge that there are no future tenants for IAMP One under contract.

The emergence of IAMP One as a suggested scheme proves that the case for the development of the TEFP land, the only suitable delivery mechanism to satisfy immediate demand, is the application route presented by our client. We consider the Application timeline extremely optimistic, and will not deliver IAMP One in the predicted timescale.

OBEJCTION – POLICY COMPLIANCE AND PLANNING MERITS

Comprehensive Development

IAMP AAP Policy S1 requires the comprehensive development of IAMP. This policy requires Masterplans,

Design Codes and Phasing Plans to be submitted which demonstrate how development:
i will meet the objectives of the AAP and will not prejudice comprehensive development of the IAMP;
ii ensures the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone and established infrastructure;
iii contributes fully to the delivery of the IAMP as a project of national significance;
iv contributes fully, in a proportionate and timely manner, towards providing the infrastructure identified in the Infrastructure Delivery Plan (IDP) (Appendix 6);
v contributes fully, in a proportionate and timely manner, to providing for the mitigation required for the IAMP, including environmental mitigation; and
vi is capable of being implemented without breaching the provisions of the Planning Act 2008.

A draft Design Code for IAMP was submitted with the IAMP ONE Application. Paragraph 82 of the IAMP

AAP states:
"*The scale and national significance of the IAMP mean that it is inappropriate to allow it to come forward on a piecemeal basis, as this would undermine the IAMP AAP objectives and prejudice delivery".*

We have serious concerns that the IAMP One proposals will prejudice the comprehensive development of

IAMP and will harm the delivery of IAMP as a project of national significance. The concerns relate to:

- Highway safety;
- Prejudice to the delivery of highway infrastructure;
- Failure to deliver landscape and ecological mitigation within IAMP ONE; and
- Prejudice to the delivery of other necessary mitigation.

These matters are discussed below.

Highways Safety and Delivery

We make the following observations:

1) The methodology adopted in the forecasting of development generated vehicular trips, contradicts the approach that the Council insisted was appropriate during the formulation of policies contained within the IAMP APP (with no justification for the change in approach or comparison of results).

2) Traffic surveys conducted during 2015 have been used to represent existing baseline operational conditions on the local highway network, which will be more than 3 years old by the time of likely consideration by the LHA. The traffic surveys were also conducted in mid March, which is not technically a neutral traffic period in accordance with the definitions set out in both DMRB and WebTAG.

3) The Transport Assessment ("TA") considers committed development in the local area, however, it provides no consideration of the phasing of wider IAMP development up to 2028 (i.e. the future design year) and the traffic generation that may be likely by this time.

4) The methodology adopted in the forecasting of background traffic growth, contradicts the approach that the Council insisted was appropriate during the formulation of policies contained within the IAMP AAP (with no justification for the change in approach).

5) The junction modelling exercise presented within the TA demonstrates that a number of the intersections under consideration are currently operating above capacity (and likely still would be even if a theoretical adjustment is made to synthesise MOVA control). On the basis of the presented modelling results, they are not capable of supporting any additional traffic demand without significant infrastructure upgrades which will not be delivered prior to 2021 at the earliest.

6) The TA demonstrates that even with the modest mitigation scheme proposed by the Council, the A19/A1290 Downhill Lane junction will not be capable of supporting the quantum of development generated traffic flows during periods of peak demand on the network in the designated design year (with average queue lengths on the A19 northbound offslip forecast to exceed 340m in length, which will likely equate to maximum queue lengths in the region of approximately 500m at critical times, thus extending back onto the A19 mainline and resulting in concerns over the safe operation of the strategic highway network).

7) The TA incorrectly concludes that the surrounding network, subject to the proposed mitigation on the A1290, can accommodate the additional traffic generated by the development without significant queuing or delay and that the impact of development traffic on the road network will not be severe.

The areas of concerns raised have been addressed in the Transport and Accessibility section of the main report.

Landscape and Ecological Mitigation and Impacts

We make the following observations:

Scope of Baseline EIA Report

1) The EIA has no assessment of the baseline ecological status of the aquatic ecology of the watercourses (River Don ad River Wear) which receive surface and groundwater discharges from the proposed development e.g. fish, aquatic invertebrates. This is despite the development being

classified as having a ‘high’ pollution hazard with EA and LLFA (pg. 34 of Systra Flood Risk and Drainage Strategy EIA).
2) No bat emergence surveys of trees identified in the WYG 2015 baseline report as having potential bat roost features have been undertaken contrary to ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System states that ‘It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making a decision’.

3) The existing ecological value of the Ecology and Landscape Maintenance Area (EMLA) is not described or evaluated.

Impact Assessment

Impacts Arising from Flood Risk and Drainage:

1) The Flood Risk and Drainage Strategy EIA identified that 5% of the site is within flood zone 3 and 25% in flood zone 2. Impacts of fluvial flooding on wildlife have not been considered but could result in pollution with other parts at high and moderate risk from surface water flooding. It is proposed that this risk is address by raising floor levels but the risk of car parks flooding with associated pollution impacts is not addressed. The EIA states that there is a risk of urban contaminates in surface water runoff flowing into receiving water courses with the IAMP siteidentified as having a ‘high’ pollution hazard with EA and LLFA (pg. 34 of Systra EIA).

2) The impacts of changes in surface and ground water flows, flooding and water pollution (including accidental spillage) on the ecology of receiving watercourses (the River Don and the River Wear?) have not been addressed. This is despite the confirmed presence of a European protected species (otter) and UK protected species (schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (WCA) (otter and water vole) on the River Don within proximity to the development site.

3) There is no baseline data on the aquatic ecology of the River Don despite these identified impacts arising from the development on it with the receiving watercourses having the potential to host UK priority fish and aquatic invertebrate species which could be adversely impacted by the proposed development.

Impacts on EPS and UK Protected Species:

4) Disturbance impacts on otter and water vole arising from the proposed development have not been adequately addressed despite the red line boundary being located on the River Don banks, with the indicative masterplan showing engineering works within a few metres of the river at locations where water vole burrows and feeding signs etc. have been recorded and within proximity to confirmed otter activity.

5) No consideration is given to disturbance impacts arising from the proposed development on otter and water vole e.g. from human disturbance including dog walkers, lighting, noise etc. despite the red line boundary encompassing areas of known water vole habitat.

6) The Application is therefore contrary to ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System states that ‘It is essential that the presence or otherwise of protected species, and the extent that they may be

affected by the development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making a decision'.

7) Under the Conservation of Habitats and Species Regulations 2017 it an offence to Intentionally or recklessly damage, destroy or obstruct access to any breeding site or resting place of otter. Under the Wildlife and Countryside Act 1981 it is an offence to intentionally kill, injure, or take water vole or otter or to interfere with places used for shelter or protection, or intentionally disturbing animals occupying such places.

Impacts on Birds:

8) Construction (including specifically earth movements) is proposed to start June/July 2018 i.e. during the bird breeding season despite the proven presence of UK priority ground nesting birds e.g. skylark within the Application site.

9) The loss of arable land is assessed as 'a minor adverse significant effect' (pg. 24) (despite the presence of national priority bird species (wintering and breeding) associated with it because arable land is 'ubiquitous' at IAMP ONE site. The site supports a regionally significant farmland bird assemblage both during the winter months and the breeding period with WYG 2015 reporting 36 notable species during the winter period and 29 notable species within the wider IAMP site of which 5 of the breeding species are listed on schedule 1 of the WCA and therefore afforded strict protection from disturbance during the bird breeding season.

10) There is no quantitative assessment of the species or number of birds that will be either directly or indirectly lost to the proposed development (through habitat loss) or indirectly affected through e.g. disturbance and no prediction as to how this would change as a result of the proposed development.

11) Specifically, there is no assessment of the likely impacts of development on the schedule 1 WCA protected bird species, which include barn owl, fieldfare, hen harrier, peregrine falcon and kingfisher despite the highrisk of development resulting in disturbance to nest sites and the loss of foraging and commuting habitat which could prevent successful breeding.

12) Given the scale of habitat loss within the site, it is predicted that the impact on breeding, passage and overwintering birds would be significant and require mitigation. However, the EIA states that: Impact on Breeding, passage and Overwintering Birds: given their mobility, birds will be displaced and take up residence in neighbouring areas, so impacts are reversible in short to medium term.

This assessment takes no account of the fact that overall there will be a net loss of suitable habitat for breeding, passage and overwintering bird species (including species identified as national priority), and it assumes that other habitat is present and available within proximity to the site with no assessment of the location of such land, its current use by birds and whether this land is currently operating at its maximum carrying capacity for these species.

13) It cannot be assumed that the EMLA land will provide the scale or level of mitigation required to offset impacts on bird populations, as there is no assessment of current bird populations on the EMLA and how these will change as a result of the proposed habitat enhancement works.

Impact on EMLA land:

14) No assessment of the proposed habitat works within the EMLA has been provided.
Services:

1) A development of this size will require considerable upgrading of existing services e.g. power, gas, water mains, surface water discharge points etc. probably resulting in offsite and boundary impacts e.g. hedgerow loss, work within existing watercourses. No description of these works is provided within the EIA and no assessment of their impact on ecology.

Ecological Mitigation:

1) As noted above, it is unclear how the engineering operations within the DCO / IAMP Two boundary will be delivered.

2) The EIA provides no explanation or justification as to why this area of land is to be provided as part of the IAMP One Application and on what basis the proposed offset land was selected. The EIA identifies that the offset land is currently in an ELS scheme (see Fig 2.4 in WYG Baseline Report) with the management of the offset land to be 'steered by entry and higherlevel

Countryside

Stewardship principles' (pg. 31). No mechanism is proposed to ensure the longterm retention and management of offset land for biodiversity in perpetuity (or until such time as the development land is non-operational and returned to a greenfield state). The longterm management of the land should be secured under a section 38 WCA agreement or other similar mechanism, but none is proposed. The management body is not defined, and no oversight of the management body is proposed. No monitoring scheme has been proposed to establish whether the EMLA delivers its aims and objectives (which are also not defined) and no mechanism identified for remedial or additional works should the EMLA not deliver biodiversity mitigation of the scale and nature intended.

3) As such there is real doubt as to whether the proposed EMLA:

• Will be delivered as part of the Application.
• Will result in net biodiversity enhancement to its current condition.
• Will offset the adverse ecological impacts resulting from the proposed development, which include net greenspace loss**.**

The areas of concerns raised have been addressed in the Ecological and Biodiversity section of the main report. Its explains how the ecological and mitigation will function and its recommended that conditions be imposed, to ensure a satisfactory form of mitigation is provided.

Plot 3 Detailed Application:

1) The planning proposal differs from the illustrative IAMP masterplan in the following areas:

• A belt of strategic landscape and swales north east of Plot 3, which is shown on the illustrative landscape plan, is not included.

• The SUDS provision is not consistent with the surface water maintenance plan/strategy shown on Systra surface water maintenance plan for IAMP 1.

2) The Plot 3 Design and Access Statement identifies the need for flood protection works on land to the north of the site to enable the development, but the location, nature and timing of these

works is unspecified. Are these works in the redline boundary? What would the ecological impacts of these works be?

3) Will surface water from this development be discharged to the River Don. If so what would the impacts of this be on the aquatic and terrestrial ecology of the River Don – the EIA is currently deficient with respect to impacts on aquatic ecology. There is also the risk of impacts on water vole, otter and kingfisher – a legally protected species.

4) The ecological impacts of the proposed Plot 3 development have not been specifically identified and no ecological mitigation is proposed as part of this development; there is also no commitment to deliver any part of EMLA as part of this planning approval. As such this development could proceed without any ecological mitigation being delivered.

The areas of concerns raised have been addressed in the main section of the main report. Its explains how the ecological and mitigation will function and its recommended that conditions be imposed, to ensure a satisfactory form of mitigation is provided. Conditions will be imposed on the outline and full element of the proposal to ensure a satisfactory form of development is achieved.

Flood Risk and Drainage:

1) The site area within Flood Zone 3, is not being developed upon and additional compensatory storage is proposed to be provided as agreed with the EA. However, evidence of this agreement, including attenuation volumes and discharge restrictions is not provided within the report.

2) The volume of how flood compensation is catered for is unknown. In addition, during heavy storm events, the flood compensation areas also act as attenuation facilities for IAMP One but there is no evidence of an integrated model illustrated the flooding effects of River Don and IAMP One – as such the flood risk appears unknown. This should be clearly demonstrated to ensure flood risk is suitably mitigated.

3) There is evidence of discussing the flood levels and floor levels of the proposed site with the EA, however there is no mention of the bund set at the 1 in 100 year plus 50% climate change as shown on Drawing no. IAMP_ONESYSHDGZA1DRD05014S0P04.
Evidence is required to show that sufficient compensatory storage has been provided and that flood risk has not been increased off site.

4) The northern catchment area of the site discharges into the River Don via swale and ponds providing attenuation. River levels have not been provided for storm events below the 1 in 100 year frequency, therefore the effectiveness of such attenuation cannot be assessed as the likelihood of the storage being submerged during heavy rainfall events is unknown.

5) The layout drawings are in accordance with 'NonStatutory Technical Standards for Sustainable Drainage' LASOO, 2016. However, quantities relating to flood compensatory and attenuation require clarification (refer to Flood Risk and Drainage Strategy Review notes above.

6) The 3rd party evidence requirements are not in accordance with 'NonStatutory
Technical Standards for Sustainable Drainage' LASOO, 2016. This is particularly important from the EA for the discharge into the River Don.

7) For the surface water drainage connection discharging into the Culvert, evidence from Sunderland City Council has not been provided. This should be provided for planning submission.

8) For the surface water drainage connection discharging into the River Don, evidence from EA has not been provided. This should be provided for planning submission.

Summary
We demonstrate that the Application proposals are fundamentally deficient. They would result in an increase in queue lengths on the road network which would present a severe impact during peak periods.

This results in a highway safety concern, contrary to AAP Policy T1, UDP Policy T14 and draft CSDP Policy CC5. Additionally the Application Proposals fail to deliver the required ecological mitigation contrary to AAP Policies S1, EN2, IN1 and Del2, draft CSDP Policy CS7.7, UDP Policies CN18, CN22, and CN23 as well as paragraphs 109 and 118 of the NPPF.

We demonstrate that the scheme would prejudice the comprehensive development of IAMP and would harm the delivery of IAMP as a project of national significance, contrary to the objectives and policies of the AAP, the draft CSDP, the UDP and NPPF.

The areas of concerns raised have been addressed in the Flood Risk and Drainage Section of the main report. It is explained how the drainage will function and it is recommended that conditions be imposed, to ensure a satisfactory form of development is achieved and complies with relevant policies.

CONCLUSION

This speculative IAMP One scheme serves only to prevent the delivery of units on TEFP land and in an anticompetitive manner. We consider that it is appropriate that any proposals for an IAMP One scheme be referred to the Secretary of State and determined jointly with development proposals for the TEFP land. As such, we consider it inappropriate for any IAMP One application to be determined by the Council as local planning authority.

Overall, the Application represents a departure from the IAMP AAP and conflicts with the UDP, draft CSDP and NPPF. Ultimately, the IAMP One Proposals would prejudice IAMP and the delivery of a project of national significance. TEFP has serious and fundamental concerns relating to the proposals and they do not consider that the issues could be addressed through planning conditions or a Section 106 Agreement.

Therefore the Application should be refused by the determining authority.

TEFP is continuing to take professional advice on the IAMP One proposals and may make further comments on the Application during the determination period.

Letter two received 5th April 2018

This further objection is submitted on behalf of the Town End Farm Partnership (“TEFP”).

TEFP made a formal objection to the above hybrid planning application for 'IAMP One' (the "Application") on 12 February 2018 (the "Initial Objection"). Lichfields responded to the Initial Objection in a letter to Sunderland City Council (the "Council") dated 15 March 2018 (the "Lichfields Response"). TEFP has instructed their consultant team to review and respond to the Lichfields Response to the Initial Objection. Below we set out our further serious concerns and objections to the Application arising in light of that review.

Transparency and due process

TEFP has noted the comments in the Lichfields Response relating to consultation, due process, comprehensive development, and interest from suppliers. TEFP does not accept the Lichfields Response and is continuing to take professional advice on these matters.

Ecology

The Lichfields Response continues to imply that the proposed ecological impacts are acceptable and that the proposed ecological mitigation is appropriate. TEFP does not accept the Lichfields Response for the reasons set out in the Initial Objection and the reasons below:

1. There are inaccuracies in the survey data on which the EIA for the Application is based e.g. failure to identify an area of magnesian limestone (a UK habitat of principal importance under NERC s41) habitat within the development area.

2. There has been a failure to adequately survey and assess impacts on the aquatic environment (including but not limited to fish and aquatic invertebrates which are likely to include NERC s41 species), specifically the River Don which will receive surface water flows from the Application site. Given the confirmed presence of water vole and otter on the River Don within proximity to the Application site then these legally protected species are also likely to be either directly and/or indirectly impacted by changes in both surface water flows and water quality including urban runoff, oil contaminants, and slats from car parking areas. The applicant states that 'Surface water on site will be managed via a number of attenuation ponds that enable water quality to be maintained'. However attenuation ponds are designed to regulate surface water flows; not water pollution.

3. There remain ongoing concerns regarding disturbance impacts on otters and water vole, with the applicant referring to a conditioned Habitat Management Plan (HMP) that will include proposals and measures to be agreed with the Council to "restrict and minimise public access to areas of ecological sensitivity, in order to minimise disturbance from humans, lighting and noise during the operation of IAMP ONE". With no details provided regarding the nature or extent of such controls, there can be no conclusions drawn regarding their suitability or effectiveness.

4. The applicant has stated that the Application is consistent with SEPA Guidance which states that 'a 2m buffer is the minimum provision that should be considered'. This guidance is not applicable for sites where development and associated construction works is proposed but relates to the long-term management of rivers in agricultural landscapes. The guidance states that General Binding Rule 20 requires a buffer strip at least two metres wide to be left between surface waters and wetlands and cultivated land. It goes in to state that:

"One of the most important factors to consider in the design of a buffer strip is how wide it should be. The width is mainly dependant on the objective (erosion control, diffuse pollution mitigation, habitat restoration) and the conditions at the site where it is to be used.
…
Buffer strip for wildlife benefit
A strip of at least 10m is recommended; generally speaking, the wider the buffer strip the more beneficial it is for wildlife. As above, the exact size will depend on:
- site situation;
- what wildlife already exists at that location;
- how land and existing vegetation is currently managed;
- any links to the wider countryside or other buffer zones."

There are numerous examples of much wider buffer zones than the Application proposes being adopted. For example, Forestry Commission advice1 is that the riparian buffer should reflect stream size and the natural dimensions of the riparian zone. Minimum widths for either side of the stream channel are:

1 https://www.forestry.gov.uk/fr/infd-6mvk4u

- 5 m for streams <1 m wide - 10 m for streams 1 - 2 m wide - 20 m for streams >2 m wide. Where the natural riparian zone exceeds these widths, the dimensions of the buffer area should be increased, up to twice the minimum recommended width. UKMATTERS:47595504.1

5. There remain significant concerns regarding the capability of the proposed offset area to deliver the ecological gains proposed. In reality, the offset is an area of agricultural land, which is currently managed in accordance with environmental stewardship principles, and which will continue to remain in agriculture management after development. The applicant uses the opaque phrase management of the land will be 'steered by entry and higher-level Countryside Stewardship principles'. As such there can be no guarantee that the conservation value of the land will be any different from its current value. There remains real doubt as to whether the proposed EMLA will:

- be delivered as part of the planning application;
- result in net biodiversity enhancement of to its current condition;
- offset the adverse ecological impacts resulting from the proposed development, which include net greenspace loss.

6. There remain significant concerns regarding the impact on breeding, passage and overwintering birds. Given the scale of habitat loss within the Application site, it is predicted that the impact on breeding, passage and overwintering birds would be significant and require mitigation. However, the EIA states that: Pg 27: *"Impact on Breeding, passage and Overwintering Birds: given their mobility, birds will be displaced and take up residence in neighbouring areas, so impacts are reversible in short to medium term."* This assessment takes no account of the fact that overall there will be a net loss of suitable habitat for breeding, passage and overwintering bird species (including species identified as national priority), and it assumes that other habitat is present and available within proximity to the site with no assessment of the location of such land, its current use by birds and whether this land is currently operating at its maximum carrying capacity for these species. It cannot be assumed that the EMLA land will provide the scale or level of mitigation required to off-set impacts on bird populations, as there is no assessment of current bird populations on the EMLA and how these will change as a result of the proposed habitat enhancement works.

7. In relation to the offsite and boundary impacts of upgrading services, the applicant has stated that *"IAMP LLP is committed to the delivery of substantial infrastructure and the upgrading of existing services as explained earlier in this letter. All effects arising from the delivery of the IAMP ONE project as defined in the project description have been assessed accordingly as described within the ES. The likely effects have been assessed in accordance with the project description including the provision of services and ancillary infrastructure."* Notwithstanding this statement, these impacts do not appear to be addressed in the ES.

Drainage

TEFP does not accept the Lichfields Response in relation to drainage and flood risk issues. The previous items raised in the Initial Objection have yet to be responded to allow the concerns raised to be allayed. The items raised included the evidential requirements for discharge

restrictions and outfall locations from the Council, as Lead Local Flood Authority, and the Environment Agency.

The Lichfields document '*IAMP ONE Planning Application – Response to Comments by the Town End Farm Partnership'* did not provide a clarifying response to Flood Risk and Drainage items raised. The response stated advised '*Information to clarify queries raised by the Environment Agency and Local Lead Flood Authority is currently being prepared. We will provide a response to queries raised, as well as queries raised by HPS, shortly*'– that response is still outstanding. The SYSTRA document '*IAMP ONE – FLOOD IMPACT NON-TECHNICAL STATEMENT*' provided a simplification of the design but, again, does not provide a response to the concerns raised. Of particular importance is to understand how the site surface water drainage system and attenuation pond works in correlation to the compensation storage from the River Don. The tow aspects of design should not be independent and an integrated design should be provided to ensure both site and off-site flood risk has been appropriately mitigated.

In addition, we note that there appear to be inconsistencies in regard to numerical information provided between this statement and earlier design information. Consistent numerical information should be provided, again, to ensure both site and off-site flood risk has been appropriately mitigated.

Highways

TEFP does not accept the Lichfields Response in relation to highway safety and delivery. The Initial Objection raised seven points in relation to highway safety and delivery, which are addressed in the Lichfields Response. These points and the Lichfield response are replicated below, with additional comments from TEFP.

1. **TEFP Comment**: The methodology adopted in the forecasting of development generated vehicular trips, contradicts the approach that the Council insisted was appropriate during the formulation of policies contained within the IAMP AAP (with no justification for the change in approach or comparison of results).

Lichfields Response: The approaches adopted to forecast trip generation are appropriate for each respective purpose. The trip rate methodology for the IAMP AAP reflected the broader range of possible end users across the whole of the IAMP site, whereas the methodology for the IAMP ONE planning application reflects the demand likely to be generated by motor manufacturing suppliers; the envisaged occupants of this first phase of IAMP.

The methodology used to forecast IAMP ONE development trips was agreed with the local highway authority and Highways England and we note was also adopted by the TEFP planning application (LPA ref: 16/01341/HE4).

TEFP Response: These trip rates were indeed adopted by the TEFP planning application (LPA ref: 16/01341/HE4) and were subsequently criticised by Lichfields (on Page 19 of their 'Town End Farm Partnership Appeal: Statement of Case of Sunderland City Council' document) as forming a "flawed" methodology. It is difficult to see how Lichfields can justify overlooking the "obvious discrepancy" that they previously took issue with and promote the use of this methodology in relation to the IAMP One planning application.

2. **TEFP Comment**: Traffic surveys conducted during 2015 have been used to represent existing baseline operational conditions on the local highway network, which will be more than 3 years old by the time of likely **consideration** by the LHA. The traffic surveys were also conducted in mid

March, which is not technically a neutral traffic period in accordance with the definitions set out in both DMRB and WebTAG.

Lichfields Response: Traffic surveys from 2015 are not presented as existing baseline operational conditions. Existing baseline operational conditions on the local highway network consider a baseline year of 2018 using appropriate traffic growth factors, as outlined in Section 4.3 of Chapter L (Access and Transport) of the IAMP ONE Environmental Statement and Section 7.2 of the Transport Assessment.

TEFP's criticism regarding the appropriateness of traffic surveys conducted in March has been addressed extensively as part of the IAMP AAP process, with additional evidence presented to demonstrate that the traffic data is from a 'representative' month and is consistent with a typical, neutral, daily flow. It is not an issue deserving of being re-opened.

TEFP Response: The application of traffic growth (to represent a future design year) merely increases the global volume of traffic under consideration by the Council's transport consultant. One of the fundamental reasons for ensuring that recent and representative baseline flows are captured (prior to beginning a traffic forecasting exercise) is to ensure that the turning profiles and subsequent distribution of vehicles throughout the network is as accurate as possible. Various concerns were indeed raised in relation to the IAMP AAP at the Examination in Public, however, the additional evidence presented did not satisfactorily appease these concerns (as was documented at the time). In light of the fact that the consideration of this planning application forms a completely separate process to the IAMP AAP Examination in Public, it is our opinion that we have every right to raise these concerns again. TEFP would appreciate an appropriate level of consideration from the Council's representatives, during the determination of a major planning application, rather than issuing dismissive responses such as the one above.

3. **TEFP Comment**: The Transport Assessment ("TA") considers committed development in the local area, however, it provides no consideration of the phasing of wider IAMP development up to 2028 (i.e. the future design year) and the traffic generation that may be likely by this time.

Lichfields Response: Committed developments included within the TA were agreed with the local highway authority and South Tyneside Council. It is not appropriate for the TA to consider the traffic impact of the wider IAMP development, which includes significant highway mitigation that will influence how traffic routes on the network. The wider IAMP development will be subject to a separate Development Consent Order application, accompanied by a detailed environmental statement, which will consider IAMP ONE as a committed development, if planning permission is granted.

TEFP Response: The IAMP AAP is adopted policy to guide the development of the DCO site over the 15 year period between 2017 and 2032, the traffic generating impact of which should be given consideration within the IAMP One TA. The Council tests the operation of the surrounding highway network during a future design year of 2028 (i.e. only four years prior to the end of the AAP period) in the TA, without giving any due consideration to the traffic generating potential of the remainder of the IAMP site which will have been developed by this point or the infrastructure improvements which will have been delivered as part of the proposal. The Council has previously submitted its evidence base as part of the IAMP AAP and is, therefore, more than capable of replicating the levels of forecast traffic, the effects of infrastructure improvements and subsequent dynamic re-assignment of trips that this will result in. It is fundamentally incorrect to suggest that following standard Transport Assessment due process is not appropriate.

4. **TEFP Comment**: The methodology adopted in the forecasting of background traffic growth, contradicts the approach that the Council insisted was appropriate during the formulation of policies contained within the IAMP AAP (with no justification for the change in approach).

Lichfields Response: The matter of background traffic growth was addressed extensively as part of the IAMP AAP. Additional explanation was provided within post-Hearing correspondence with TEFP on Matter 6 (Infrastructure Transport and Access) and the approach to traffic growth within the TA is consistent with the Council's response on this issue.
The development of IAMP in full will result in significant traffic growth locally and a redistribution of traffic movements on the network will also occur, therefore the additional application of background traffic growth was not appropriate for the IAMP AAP assessments. However, traffic generated by IAMP ONE would not be significant enough to represent traffic growth on the wider road network and as such, it is appropriate that background traffic growth is included within the IAMP ONE assessments.

TEFP Response: Various concerns were raised in relation to the IAMP AAP at the Examination in Public, however, the additional evidence presented did not satisfactorily appease these concerns (as was documented at the time). In light of the fact that the consideration of this planning application forms a completely separate process to the IAMP AAP Examination in Public, it is our opinion that, once again, we have the right to raise these concerns. TEFP doubt the appropriateness of the adjusted growth rates to accurately represent future operational conditions on the surrounding highway network in 2028 (especially given the fact that the Council is also effectively neglecting the impact of the wider IAMP site during this future design year).

5. **TEFP Comment**: The junction modelling exercise presented within the TA demonstrates that a number of the intersections under consideration are currently operating above capacity (and likely still would be even if a theoretical adjustment is made to synthesise MOVA control). On the basis of the presented modelling results, they are not capable of supporting any additional traffic demand without significant infrastructure upgrades which will not be delivered prior to 2021 at the earliest.

Lichfields Response: It is not clear which specific intersections are being referred, however, in instances where junctions are already operating above capacity, consideration has been given to the resultant impact on queue lengths. In all cases, the addition to queue lengths resulting from IAMP ONE traffic does not give rise to safety concerns and the impact is therefore not severe, as explained in the Transport Assessment.

TEFP Comment: A number of intersections within the study area are presented as operating significantly over capacity in the existing scenario (even before IAMP One traffic is added to the network). It remains our opinion that on the basis of the presented modelling outputs, these junctions are not capable of supporting the additional traffic forecast to be generated by IAMP One without resulting in severe harm (in accordance with the National Planning Policy Framework) to the efficient and safe operation of the surrounding highway network.

6. **TEFP Comment**: The TA demonstrates that even with the modest mitigation scheme proposed by the Council, the A19/A1290 Downhill Lane junction will not be capable of supporting the quantum of development generated traffic flows during periods of peak demand on the network in the designated design year (with average queue lengths on the A19 northbound off-slip forecast to exceed 340m in length, which will likely equate to maximum queue lengths in the region of approximately 500m at critical times, thus extending back onto the A19 mainline and resulting in concerns over the safe operation of the strategic highway network).

Lichfields Response: The operation and assessment of the A19/A1290 Downhill Lane junction has been discussed extensively with Highways England as part of the IAMP ONE Consultation Exercise. The assessment of this junction was undertaken using a specific junction modelling approach to allow the impact of the proposed mitigation to be quantified and results compared. Section 8.4 of the TA explains this methodology and explains how queue lengths should be considered holistically across the junction - it is not appropriate to consider the A19 north-bound off-slip queue lengths in isolation.

During pre-application discussions, Highways England outlined that queue lengths extending back onto the A19 mainline will not be acceptable on safety grounds. Highways England have undertaken a comprehensive review of our assessments and are satisfied, subject to conditions, that the junction is capable of supporting the traffic generated by IAMP ONE.

TEFP Response: The performance of the A19/A1290 Downhill Lane intersection, following implementation of the Council's proposed mitigation scheme, is documented as operating well above the 90% reserve capacity threshold commonly used to assess the appropriateness of a junction's performance. The presented results illustrate that the upgraded junction will operate only just below the 100% theoretical capacity threshold (however this is on the basis of adopting the supposedly "flawed" trip generation figures, the use of which Lichfields have gone on record as stating provide results that "are not an appropriate representation of operating conditions" in relation to traffic impact).

For clarification; we have not considered the operation of the A19 north-bound off-slip in isolation (this is merely one example of where the TA draws a misleading conclusion from the information presented within the technical analysis).

7. **TEFP Comment**: The TA incorrectly concludes that the surrounding network, subject to the proposed mitigation on the A1290, can accommodate the additional traffic generated by the development without significant queuing or delay and that the impact of development traffic on the road network will not be severe.

Lichfields Response: Section 8 of the TA provides detailed operational capacity assessments on the surrounding network to allow the respective highway authorities to determine the traffic impact of IAMP ONE. It is maintained that with the identified mitigation in place, the impact of IAMP ONE development traffic on the road network will not be severe, in accordance with the National Planning Policy Framework (NPPF).

TEFP Response: Section 8 of the TA presents the results of detailed traffic modelling, which illustrates that a number of intersections within the study area are operating significantly over capacity in the existing scenario (without IAMP One generated traffic). It remains our opinion that on the basis of the presented modelling outputs, these junctions are not capable of supporting the additional traffic forecast to be generated by IAMP One without resulting in severe harm (in accordance with the National Planning Policy Framework) to the efficient and safe operation of the surrounding highway network. The conclusions drawn within the TA are fundamentally incorrect in our opinion and, as such, we maintain our objection to the development proposal on the grounds of highway safety and delivery.

Summary

We again demonstrate that the Application proposals are fundamentally deficient. They would result in an increase in queue lengths on the road network which would present a severe impact during peak periods. This results in a highway safety concern, contrary to AAP Policy T1, UDP Policy T14 and draft CSDP Policy CC5. Additionally the Application Proposals fail to deliver the

required ecological mitigation contrary to AAP Policies S1, EN2, IN1 and Del2, draft CSDP Policy CS7.7, UDP Policies CN18, CN22, and CN23 as well as paragraphs 109 and 118 of the NPPF.

CONCLUSION

We remain of the view that the IAMP One scheme serves only to prevent the delivery of units on TEFP land and in an anticompetitive manner. We consider that it is appropriate that any proposals for an IAMP One scheme be referred to the Secretary of State and determined jointly with development proposals for the TEFP land. As such, we consider it inappropriate for any IAMP One application to be determined by the Council as local planning authority.
Overall, the Application represents a departure from the IAMP AAP and conflicts with the UDP, draft CSDP and NPPF. Ultimately, the IAMP One Proposals would prejudice IAMP and the delivery of a project of national significance. TEFP has serious and fundamental concerns relating to the proposals and they do not consider that the issues could be addressed through planning conditions or a Section 106 Agreement. Therefore the Application should be refused by the determining authority.

TEFP is continuing to take professional advice on the IAMP One proposals and may make further comments on the Application during the determination period.

Letter three received 24th April 2018

This further objection is submitted on behalf of the Town End Farm Partnership ("TEFP").

TEFP made a formal objection to the above hybrid planning application for 'IAMP One' (the "Application") on 12 February 2018 (the "Initial Objection") and on 5 April 2018. Lichfields responded to the Initial Objection in a letter to Sunderland City Council (the "Council") dated 15 March 2018 (the "Lichfields Response"). TEFP instructed their Consultant Team to review and respond to the Lichfields Response to the Initial Objection and their subsequent submission of an amendment to the original Environmental Statement ("ES"). Once again we write to set out our client's ongoing serious concerns and continued objections principally outlined in our letter of 5 April 2018.

Lichfields submitted an amendment to the Planning Application on 6 April 2018, which included the following documents:

- *Chapter One – Water Resources and Flood Risk* of the IAMP One ES, including an updated Flood Risk Assessment and Drainage Strategy;
- *Chapter K – Ecology and Biodiversity* of the IAMP One ES;
- *Chapter L – Access and Transport* of the IAMP One ES;
- *Outline Construction Traffic Management Plan*

We note the Lichfields letter of 6 April 2018 states that Chapter One, *Water Resources and Flood Risk* of the ES has been updated in response to consultee comments from the Environment Agency and the Local Lead Flood Authority. TEFP confirms that Lichfields have in no way addressed any of the concerns raised within our formal objection letters identified above and, therefore, we maintain our serious concerns and uphold the objections previously identified.

The proposed amendment to Chapter K – *Ecology and Biodiversity* have been made, we are told in the Lichfields cover letter, in response to clarifications required by the Council's Ecology

Officer. These amendments have not sought to address any of the concerns raised by TEFP and, therefore, we continue to maintain serious concerns object in the strongest terms upholding the objections previously supplied by TEFP.

The Lichfields letter of 6 April 2018 states that Chapter L, *Access and Transport* of the ES has been updated in response to rectify a discrepancy in the delivery hours between the transport documents and the noise assessment. TEFP confirms that Lichfields have in no way addressed any of the concerns raised within our formal objection letters identified above and, therefore, we maintain our serious concerns and uphold the objections previously identified.

CONCLUSION

We maintain the Application proposals are fundamentally deficient and are not Policy compliant. We maintain our view that the IAMP One scheme serves only to prevent the delivery of units on TEFP land and in an anticompetitive manner. We consider that it is appropriate that any proposals for an IAMP One scheme be referred to the Secretary of State and determined jointly with development proposals for the TEFP land.

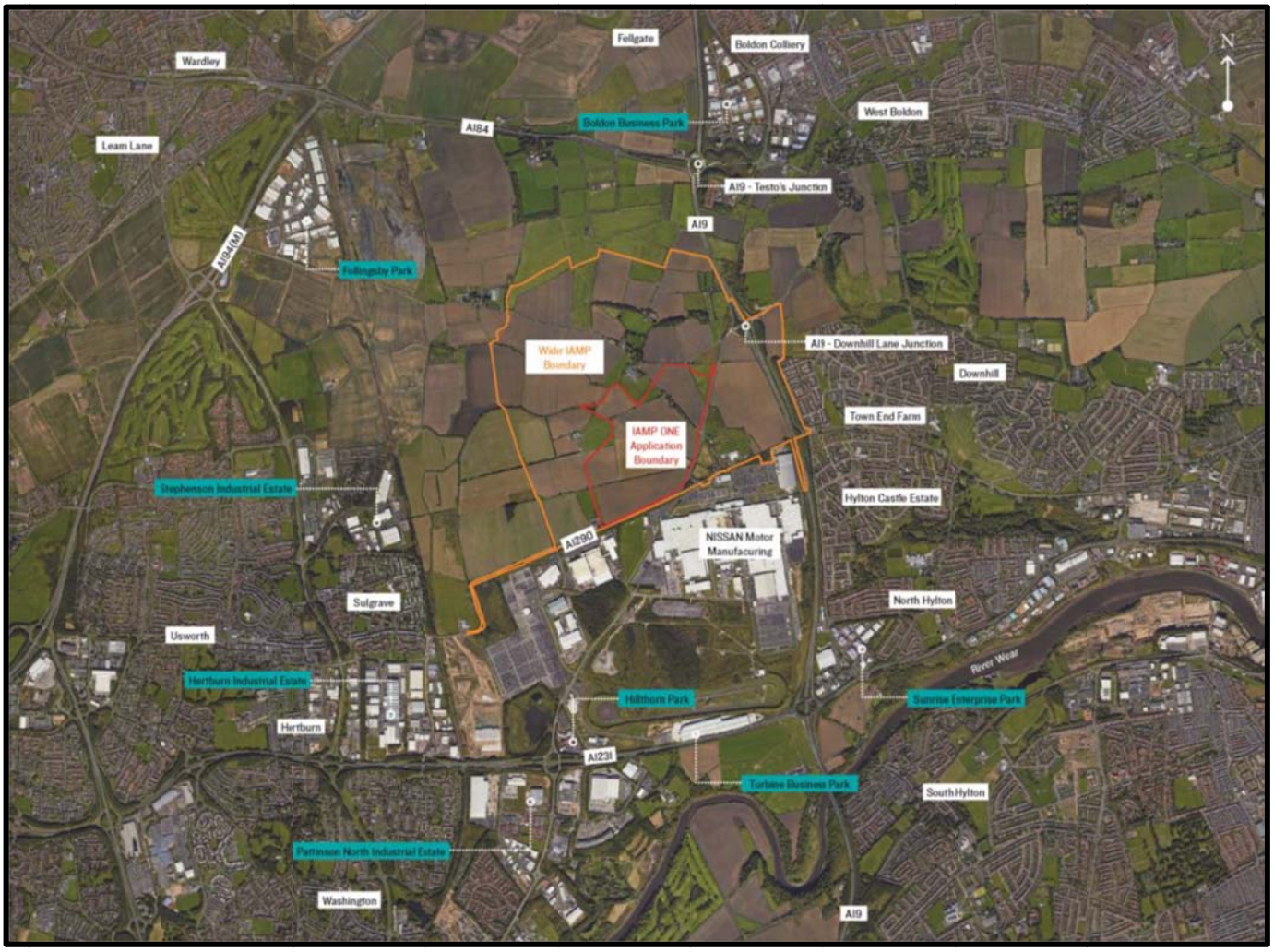
Overall, the Application represents a departure from the IAMP Area Action Plan and conflicts with the UDP, draft CSDP and NPPF. Ultimately, the IAMP One proposals are not considered comprehensive development as envisaged by IAMP AAP and would prejudice the delivery of IAMP as a project of national significance. TEFP remains to have serious and fundamental concerns relating to the proposals and they do not consider the issues could be addressed through planning conditions or a Section 106 Agreement. The Application, therefore, should be refused by the Determining Authority.

TEFP is continuing to take professional advice on the IAMP One proposals and may make further comments on the Application during the determination period, specifically when amended and updated documents are submitted.

The letters of representation are included in appendix 1 for Members easy of reading. The main report covers the areas raised within the 4 letters of objection.

POLICIES:

The IAMP Area Action Plan (AAP) was adopted on 30 November 2017 by Sunderland City Council and South Tyneside Council. It provides the relevant and up-to-date planning policy framework for the comprehensive development of approximately 392,000sqm of floorspace for uses that relate to the Automotive and Advanced Manufacturing sectors. This would be delivered on a 150ha site. 110ha of adjacent land would be required to facilitate or be incidental to that development providing replacement land relating to ecological and landscape mitigation and would remain in the Green Belt.



The IAMP AAP states the following:
“The International Advanced Manufacturing Park (IAMP) represents a unique opportunity for the automotive and advanced manufacturing sectors in the UK. Located next to the UK's largest and most productive car manufacturing plant at Nissan, the IAMP will provide a bespoke, world class environment for the automotive supply chain and related advanced manufacturers. The IAMP will contribute significantly to the long-term economic success of the North East of England and the national automotive sector.” (para. 5)

“The development of the IAMP will underpin the continued success of the automotive and advanced manufacturing sectors in the UK and the North East of England. The North East of England is recognised internationally as a centre for the automotive industry due to Nissan's presence in the region since 1985. This has led to the expansion of an ‘automotive cluster’ centred on the Nissan plant north-west of Sunderland, with the nearby location of manufacturers linked to the Nissan supply chain.” (para. 8)

The proposed development must be determined using the following guidance as set out below:

- International and National Legislation;
- National Planning Policy Framework;
- Adopted Development Plan;
- Area Action Plan

- Emerging Development Plan; and
- Other Considerations.

International and National Legislation

The following European and National Legislation has been taken into account and complied with during the EIA process in the preparation of the IAMP ONE planning application:

- The Environmental Impact Assessment (EIA) Directive (2014/52/EU);
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017;
- Birds Directive (2009/147/EC);
- Habitats Directive (92/43/EEC);
- The Conservation of Habitats and Species Regulations 2010;
- The Wildlife and Countryside Act 1981 (as amended);
- The Protection of Badgers Act 1992;
- The Natural Environment and Rural Communities Act 2006;
- The Water Framework Directive (England and Wales) Regulations 2017;
- The Hedgerow Regulations 1997; and
- The Countryside Rights of Way Act 2000

National Planning Policy Framework (NPPF)

The NPPF was published and came into effect on 27 March 2012. It confirms that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is a material consideration in the determination of the accompanying planning application. Whilst much of its policy is relevant in this case, its most pertinent policies relating to the principle of development at the site are set out below.

The Presumption in Favour of Sustainable Development

The cornerstone of the NPPF is to proactively deliver sustainable development to support the Government's economic growth objectives and deliver the development which the country needs. Paragraph 7 advises that there are three dimensions to sustainable development: economic, social and environmental which perform a number of roles:

- Economic role – contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
- Social role – supporting strong, vibrant and healthy communities; and
  International Advanced Manufacturing Park (IAMP) : Planning Statement
- Environmental role – contributing to protecting and enhancing the natural, built and historic environment.

Paragraph 15 of the NPPF states:-

“Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable ***can be approved without***

delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally"

Paragraph 14 of the NPPF states:

"At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For the local planning authority this means that development should be:

Approving development proposals that accord with the development plan without delay".

Core Planning Principles

A Core Planning Principle of the NPPF at Paragraph 17 states that the planning system should:

"Proactively drive and support sustainable economic development to deliver the homes, businesses, industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth."

Building a Strong, Competitive Economy

Paragraph 18 states:

"The Government is committed to securing economic growth in order to create jobs and prosperity…"

Paragraph 19 goes on to state:

"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth."

Good Design

The NPPF places **"great importance" on good design** (paragraph 56). This paragraph continues by stating:

"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

Promoting Sustainable Transport

The NPPF advises that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and

Unitary Development Plan adopted 1998

The adopted development plan consists of the following:

- Sunderland Unitary Development Plan (UDP) (adopted September 1998);
- UDP Alternation No. 2 (Central Sunderland) (adopted September 2007); and
- International Advanced Manufacturing Park Area Action Plan (adopted 30 November 2017).

Unitary Development Plan Alteration No. 2 is not relevant, given that it relates to Central Sunderland, outside the area of consideration of this planning application.

Adopted Unitary Development Plan September 1998

The UDP was adopted in September 1998. In March 2007, all of the policies of the UDP were saved with the following exceptions:- B9, EC10,H3, H5, H9,S5, M4, M7, SA8, SA15, SA41, SA44, SA56, SA59,SA72, SA87, SA91,NA33, NA41,WA4, WA10, WA23.

The site / adjacent land is subject to several UDP polices, as shown on the Proposals Map, which are summarised as follows:

- Policy CN15 (Great North Forest) - both the site and Nissan lie within an area covered by this policy. This policy permits developments, schemes and other initiatives which assist in creating the Great North Forest (on land between and around the main urban areas). Developments which would adversely affect the creation of the forest will be resisted;

- Policy CN16 (Trees / Woodland) – this policy seeks to retain and enhance existing woodlands, tree belts and field hedgerows and encourages new planting of native species;

- Policy CN23 (Wildlife Corridor) – the section of the ELMA land within the application site, as well as Units 6 and 7 and part of Unit 5 (as identified on the indicative masterplan) are covered by a Wildlife Corridor designation. Within the wildlife corridor (i) measures to conserve and improve the environment will be encouraged, (ii) development which would adversely affect the continuity of corridor will normally be refused and (iii) where, on balance, development is acceptable because of wider plan objectives, appropriate habitat creation measures will be required to minimise its detrimental impact';

- Policies T8/9/10 (Multi-User Route) - the northern boundary along Downhill Lane is allocated as a multi-user route. This route follows the course of the River Don to the west.

- Policies T8 (Pedestrians) and T9 (Cyclists) promote the needs of pedestrians and cyclists, whilst Policy T10 (Paths and Multi-User Routes) advises that consideration will be given to the feasibility of adapting some of these routes for use by cyclists, people with disability and horse riders to provide multi-user routes;

- Policy T9 (Cycle Routes) identifies that a cycle route runs along the southern site boundary along the A1290. This policy promotes measures that assist cycling;

- Policy T12 (Strategic Route Network) – the A19 to the east and the section of the A1290 which runs along the southern site boundary are allocated as strategic routes. Wherever possible, major traffic flows and heavy goods vehicles will be encouraged to use the strategic route network; and

- Policy T13/15 (New Roads to be Constructed) – the northern section of the A1290 which runs along the western site boundary is allocated for highway improvements. This policy continues by stating that highway improvements, including new road construction, will only be promoted where they fulfil one of several criteria, including (iii) facilitate the movement of industrial traffic and assist the development or redevelopment of existing and proposed industrial and commercial areas.

- The UDP Proposals Map allocates Nissan, which lies to the south of the application site, as an area to be retained and improved for economic development (Policy EC2).

The following saved UDP policies are also relevant to the determination of this planning application:

- Policy R1 (Sustainable Development) – the City Council will work towards environmentally sustainable development which meets the economic and social needs of the city;

- Policy R2 (Resource Utilisation) – new developments should make use of existing and proposed service and social infrastructure, minimise the need for travel and make use of vacant and derelict land;

- Policy R4 (Energy Conservation) – in assessing proposals for development, the Council will have regard to evolving Government policy on the efficient use of energy and use of non-fossil fuel sources;

- EC1 (Economic Development – General) – The City Council will encourage proposals and initiatives which (i) develop the city's role as a major manufacturing centre, especially in relation to advanced or high technology processes;

- Policy EC3 (Economic Development – Business Support) – supports new and existing economic activity by providing land and premises for business and industrial use;

- Policy L10 (Countryside Recreation) – Improve and promote countryside recreational activities including (i) improving and extending the network of footpaths, bridleways and cycleways;

- Policy EN1 (Environmental Protection) – improvement of the environment will be achieved by seeking to minimise all forms of pollution;

- Policy EN5 (Noise and Vibration) – assessments of noise and vibration are required where development is likely to generate noise sufficient to increase the existing ambient sound or vibration levels in residential or other noise sensitive areas;

- Policy EN8 (Hazardous and Incompatible Uses) – developments within a consultation zone around hazardous installations will not be permitted if, in the opinion of the Health and Safety Executive, this would result in an undesirable increase in those at risk;

- Policy EN11 (Flooding and Water Quality) – in areas subject to flooding, new development will not normally be permitted. Where redevelopment is permitted in areas at risk, appropriate flood protection measures need to be agreed with the Environment Agency;

- Policy EN12 (Flooding and Water Quality) – proposals should not be likely to impede materially the flow of flood water, or increase the risk of flooding elsewhere, or increase the number of people or properties at risk from flooding; and not adversely affect water quality or availability;

- Policy B2 (Built Environment) – the scale, massing, layout and setting of new developments and extensions to existing buildings should respect and enhance the best qualities of nearby properties and locality;

- B10 (Built Environment – Listed Buildings) – the city council will seek to ensure that development proposals in the vicinity of listed buildings do not adversely affect their character of setting;

- Policy B11 (Built Environment - Archaeology) – promotes measures to protect the archaeological heritage of Sunderland and ensure that any remains discovered will be either physically preserved or recorded;

- Policy B13 (Built Environment – Mitigation Measures) – the city council will seek to safeguard sites of local archaeological significance. Preservation in situ is a preferred solution. Where this is not feasible, excavation for the purpose of recording will be required;

International Advanced Manufacturing Park Area Action Plan

The IAMP Area Action Plan (AAP) was adopted on 30 November 2017.

The AAP provides the planning policy framework for the comprehensive development of approximately 392,000sqm of floorspace for uses relate to the Automotive and Advanced Manufacturing sectors. This would be delivered on a 150ha site. 110ha of adjacent land would be related for ecological and landscape mitigation and remains in the Green Belt. Of this land, the IAMP ONE site consists of 61ha, including 4.9ha of on-site ELMA land.

The AAP's vision for the IAMP is: *"A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries. A planned and sustainable employment location that maximises links with Nissan and other high value automotive industries as well as the local infrastructure assets, including the ports, airports and road infrastructure."*

The AAP states that type of place which the Councils want to create is:

"an attractive working environment that creates the conditions in which businesses can establish and thrive and where people choose to work. A unique opportunity for increased job and business creation and the promotion of regional prosperity whilst taking advantage of natural assets and green infrastructure including the River Don corridor."

Policy S1: Spatial Strategy for Comprehensive Development – sets out the strategy for the comprehensive development of the IAMP for the principal uses associated with the automotive and advanced manufacturing businesses and states that this will be delivered by:

1 "Revising the Green Belt boundary to release 150ha of land from the Green Belt.

2 Allocating approximately 150ha of land for the development of principal uses (as defined in Policy S2) in the Employment Areas.

3 Designating approximately 110ha of land as an Ecological and Landscape Mitigation Area to provide for mitigation and/or compensation of the ecological and landscape impacts of the IAMP development.

4 Requiring Masterplans, Design Codes and Phasing Plans to be submitted which demonstrate how development:
i will meet the objectives of the AAP and will not prejudice comprehensive development of the IAMP;

ii ensures the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone and established infrastructure;

iii contributes fully to the delivery of the IAMP as a project of national significance;

iv contributes fully, in a proportionate and timely manner, towards providing the infrastructure identified in the IDP;

v contributes fully, in a proportionate and timely manner, to providing for the mitigation required for the IAMP, including environmental mitigation; and

vi is capable of being implemented without breaching the provisions of the Planning Act 2008."
Policy S2: Land Uses supports the IAMP AAP objectives to build on the area's international reputation in the automotive industry; support Nissan and attract European-scale 'super-suppliers' linked to the automotive industry. This policy states:

a Development of the Employment Areas must be for the Principal Uses of production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, as defined in paragraphs 86-87, and related Supporting Uses; and

b To ensure premises are retained for their original permitted use in the long term, the DCO must contain requirements to that effect, or otherwise the Councils may consider making a direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 to that effect.

Policy S3: Scale and Quantum of Principal and Supporting Employment Uses – states that consent will be granted for up to 392,000sqm of space consisting of:
i 356,000sqm of employment space for the Principal B1(c), B2 and B8 classes; and

ii up to 36,000sqm of employment space for Supporting B1(a) and B1(b) class uses, only where this is related to the Principal Uses defined in Policy S2.

The other policies are summarised as follows:

- Policy D1 (Masterplan Design) – provides the design concept and masterplan objectives for IAMP; to encourage a compact, permeable development which is attractive to future occupiers and flexible enough to accommodate a range of businesses. This includes maximising the interface with Nissan;

- Policy D2 (Public Realm) – provides the key principles for addressing the key public realm elements of the masterplan to deliver a scheme with a sense of place and which creates its own unity identity;

- Policy T1 (Highway Infrastructure) – identifies specific highway improvements, including upgrading the A1290; development proposals must be accompanied by a Transport Assessment and Travel Plan; and that consent will not be granted for development which adversely affects highway safety, comprises the delivery of highway improvements or prejudices the comprehensive development and delivery of the IAMP;

- Policy T2 (Walking, Cycling and Horse Riding) – the aspiration is for IAMP to be an attractive sustainable multi-modal environment and this policy requires the delivery of a permeable pedestrian and cycle network within IAMP. Bridleways will be provided to enhance access to the open space within IAMP for recreational horse riders;

- Policy T3 (Public Transport) – requires the provision of enhanced bus services and associated facilities;

- Policy T4 (Parking) – development must ensure that appropriate provision for car parking is provided in accordance with the Council's standards;

- Policy IN1 (Infrastructure Provision) – requires the delivery of infrastructure to meet the needs of the development for electricity, gas, water and telecommunications. The provision of low carbon and renewable energy systems should be explored;

- Policy IN2 (Flood Risk and Drainage) – requires a Flood Risk Assessment and surface water drainage strategy to address drainage and flood risk, including SuDS provision. Evidence is required that there is sufficient capacity, both on and off-site, in the foul sewer network to support the development;

- Policy EN2 (Ecology) – this policy sets out the principles to protect and enhance the ecological value of the IAMP and to encourage development based on sound sustainability principles. Again, this policy confirms that the ELMA land is to provide the focus for necessary ecological mitigation and compensation measures;

- Policy EN3 (Green Infrastructure) – this policy sets out the principles for the creation of Green Infrastructure, including retaining and enhancing existing mature trees, woodland and hedgerows around the edges of the development, the creation of green linkages along

main roads and inclusion of informal open spaces to provide recreational and wildlife benefits and green links between habitats;

- Policy EN4 (Amenity) – this policy takes account of amenity considerations including noise, traffic, odours and dust during the construction and operational phases of the IAMP;

- Policy Del1 (Phasing and Implementation) – this policy seeks a Phasing Strategy with any application for proposed development; and

- Policy Del2 (Securing Mitigation) - this policy advises that mitigation will be secured via articles and requirements within a DCO or by planning obligations or planning conditions.

Emerging Development Plan

The draft *Core Strategy and Development Plan 2015-2033* (CSDP) will include the development policies and site allocations, land use designations and development management policies. The draft CSDP was subject to public consultation which concluded on 2 October 2017. The Council is currently considering all representations and will publish the Consultation Report in due course.

The challenges and draft policies that are of relevance to the proposed development are summarised as follows:

Strategic Challenge 5:

"Providing a sufficient supply of employment land in the right locations to support economic growth, including the development of the IAMP."

Paragraphs 3.21 to 3.23 of the draft CSDP state:

"Advanced manufacturing and particularly the automotive sector are a key part of the local economy, centred around the Nissan plant, which is producing more than 500,000 vehicles a year, and a thriving supply chain extending along the A19, A1 corridors. The sector employs 30,000 people regionally, impacting on a further 141,000 jobs nationally. The North East accounts for 26% of all EV production across Europe and in the past 5 years there have been 46 regional investments totalling £1.6bn. ***Demand is strong for large floorplate developments****, many of which are projects linked to the growth of the automotive sector.* ***However, the lack of large sites immediately available has meant that some projects have been turned away.*** *In order to address this, the council is proposing the development of a new International Advanced Manufacturing Park (IAMP) on land to the north of the existing Nissan plant. It is anticipated that the IAMP would create some 5,228 new jobs and would be a significant driver for the regional economy and the automotive sector within the UK."*

The draft CSDP advises that the Sunderland Economic Leadership Board have developed a vision statement which sets out a medium-term pipeline of key developments that will transform the city in the period to 2024. The overall ambition of this vision is that the Council and its partners will help deliver:

- over £1bn of investment into the city's infrastructure and industrial assets;
- about 20,000 new jobs created across a range of sectors, increasing the city's productivity and reducing unemployment levels;
- a more vibrant and attractive city with more happening in terms of events, entertainment and culture; and

- a significant increase in our levels of education and skills.

To help deliver on these priorities the draft CSDP includes a vision statement and objectives that set out its ambitions. This includes that:

"Employment on the International Advanced Manufacturing Park and the A19 Corridor will ensure that the city becomes an international focus for automotive and advanced manufacturing, research and development."

Policy SS3 (Spatial Delivery for Growth) states that regeneration and sustainable growth of Sunderland to 2033 and beyond will be achieved through delivering development across the city in sustainable locations. Part 1 of this policy seeks the creation of at least 10,337 new jobs through delivering the IAMP and focusing development in other key locations. Paragraph 5.19 of the supporting text states:

"In order to drive economic growth within Sunderland and the wider region, Sunderland City Council in partnership with South Tyneside council are seeking to deliver IAMP on land to the north of the existing Nissan plant in order to build upon the inherent strengths of the area in manufacturing, and particularly the automotive sector. ***The IAMP will cover an area of 100 hectares, with a further 50 hectares of land safeguarded for future development. It is anticipated that the IAMP will create over 5,000 jobs directly on the site with many more in the wider area****."*

Policy EP1 (Economic Growth) sets out how the Council will facilitate sustainable economic growth within the city including by delivering an automotive focused international Advanced Manufacturing Park on land to the north of Nissan.

Policy CC2 (Connectivity and Transport Network) promotes the delivery of various new highway schemes and initiative including key junctions on the A19, including providing access to the IAMP. The supporting text to this policy states that:

"The council will work with Highways England to improve key junctions on the A19 in line with adjacent major development schemes, which include the proposed IAMP and SSGA. It is anticipated that the continuing success of Nissan and the development of the IAMP will generate additional vehicle movements and put pressure on the existing highway network. The IAMP AAP Infrastructure Delivery Plan contains the road improvement works that are required to specifically support the IAMP".

The following additional draft CSDP policies are also considered relevant to the consideration of the application proposals:

- Policy SS2 (Principles of sustainable development) – provides various criteria for development proposals, including minimising the impact and mitigating the likely effects of climate changes and support a reduction in flood risk from all sources; ensuring new development has an acceptable impact on neighbouring land uses; achieving a high design standard; aiming to achieve higher levels of sustainable construction; making the best and most efficient use of land; having regard to and addressing any identified impacts on the environment; and making best use of existing facilities and infrastructure;

- Policy HWS1 (Health and Wellbeing) – provides criteria for improving health and wellbeing in Sunderland;

- Policy E1 (Urban Design) – development should achieve high quality design, which protects and enhances the environment and existing locally distinctive character;

- Policy E2 (Public Realm) – existing and proposed areas of public realms should create attractive, safe, legible, functional and accessible public spaces; be constructed from quality, sustainable and durable materials and incorporate public art, where appropriate;

- Policy E4 (Historic Environment) – should be valued, protected, conserved and enhanced, sensitively managed and enjoyed for its contribution to character, local distinctiveness and sustainable communities;

- Policy E5 (Heritage Assets) – development proposals should recognise and respond to their significance. In terms of archaeology, the preservation in situ is the preference. However, where the loss is justified in accordance with national policy, the remains should be appropriately recorded;

- Policy E6 (Green Infrastructure) – the aim is to maintain and improve the Green Infrastructure network by enhancing, creating and managing multifunctional greenspaces that are well connected to each other and the wider countryside;

- Policy E7 (Biodiversity and Geodiversity) – where appropriate proposals must demonstrate how they will avoid / minimise adverse impacts on biodiversity and geodiversity and provide net gains in biodiversity;

- Policy E8 (Woodland / Hedgerows and Trees) – relates to the conservation of significant trees, woodlands and hedgerows;
- Policy E11 (Green Belt) – the Green Belt will be protected against inappropriate development;

- Policy E14 (Landscape Character) – the council will protect, conserve and enhance the varied landscape character throughout the city;

- Policy E15 (Creating and Protecting Views) – views in to, out of and within development areas should be taken account of;

- Policy E16 (Agricultural Land) – protection of the “best and most versatile” agricultural land, subject to various criteria;

- Policy E17 (Quality of Life and Amenity) – new development should not have an unacceptable adverse impact on the quality of life and amenity;

- Policy E18 (Noise-Sensitive Development) – development proposals which may generate noise should be accompanied by a noise assessment and appropriate mitigation should be provided;

- Policy E19 (Contaminated Land) – where it is considered that land may be affected by contaminated land, planning permission will only be granted where various criteria are satisfied;

- Policy E20 (Health and Safety Executive areas and hazardous substances) - development within the specified distances must take account of any risks involved and the need for appropriate separation distances;

- Policy CM1 (Climate Change and Water) – development should minimise the impact of climate change, including reducing the risk and impact of flooding;

- Policy CM4 (Flood Risk and Water) – seek to reduce flood risk, promote water efficiency measures, and protect and enhance water quality;

- Policy CM5 (Surface Water Management) – provides various criteria for the management of surface water;

- Policy CM7 (Disposal of Foul Water) – connection to the public sewer is the preferred approach;

- Policy CM8 (Sustainable Design and Construction) – provides various criteria in relation to sustainable design and construction;

- Policy CC1 (Sustainable Travel) – promotes sustainable travel and the enhancement of connectivity for all users;

- Policy CC5 (Local Road Network) – development proposals should have no adverse impact on the Local Road Network and safe and adequate access, egresses and internal circulation should be provided;

- Policy CC6 (New Development and Transport) – provides various criteria for new developments, including that they are expected to provide safe and convenient access for all road users, incorporate pedestrian and cycle routes and include vehicle and cycle parking; and

- Policy ID1 (Delivering Infrastructure) – development will be expected to provide, or contribute towards, the provision of measures to directly mitigate its impact and make it acceptable in planning terms.

Other Considerations in respect of supporting policy documents

Strategic Economic Plan

The North East Local Enterprise Partnership (NELEP) published The North East Strategic Economic Plan (SEP) in January 2017. The aim of the SEP is to focus regional and national action on **closing performance gaps, delivering positive change and helping to rebalance the economy**, and that by 2024**, 70% of all new jobs created in the North East LEP area will be 'better' jobs**.

The Plan outlines that in delivering this ambition, there are opportunities to focus on existing and emerging industrial strengths, each of which provide opportunities to improve growth and productivity performance. This includes (*inter alia*) the **advanced manufacturing, transport and logistics sectors**, which offer significant growth potential in international investment and local supply chains.

For advanced manufacturing in particular, the SEP identifies the **IAMP** as a whole as a crucial project to growing the sector, with the potential to generate around **10,000 new jobs**. The plan also highlights that the wider Site has been designated as by the Secretary of State as nationally significant and is **part of the North East Enterprise Zone**, offering incentives to support the attraction of new businesses and business growth.

City Deal

The City Deal was signed between the two Councils and the Government in 2014. The City Deal has five key aims:

- delivery of the International Advanced Manufacturing Park;
- commitment to co-designing a local Skills Compact with local businesses;
- delivery of the New Wear Crossing;
- infrastructure for Ultra Low Emission Vehicles; and
- Sunderland and South Tyneside Councils' commitment to supporting the development of the North East Combined Authority.

A key objective of the City Deal is to enable the local economy to **build on its strengths in advanced manufacturing, with a focus on the automotive sector** but also expanding the opportunities for enterprise and employment in the area.

The City Deal partners have committed funding to support the delivery of the initial planning phases. Sunderland City Council, South Tyneside Council and the NELEP will commit local funding as the project progresses.

Northern Powerhouse

The Northern Powerhouse is a proposal to boost economic growth in the North of England, bringing together cities, towns and rural communities of the North to become a powerhouse for economic growth. This is to be achieved through modern transport links, a revolutionary new style of governance and increased investment.

The Northern Powerhouse strategy which underpins this ambition seeks to ensure the Northern Powerhouse is recognised worldwide for the trade and investment opportunities it offers, supported by over half a billion pounds of investment to improve transport links, unlock housing and to enhance digital connectivity. However, key barriers to driving productivity growth are identified as: **lower levels of foreign direct investment (FDI) projects per head**, lower proportions of graduates and poor connectivity.

In order to address this, the strategy seeks to support 17 Enterprise Zones across the North by 2017, **including the IAMP**. It also recognises that the North has **significant strengths in a number of sectors which will be built upon to drive growth, including manufacturing**; with 42% of the UK's total car production manufactured in the Northern Powerhouse in 2015.

Northern Powerhouse Independent Economic Review

The Northern Powerhouse Independent Economic Review (NPIER) was commissioned by the Transport for the North (TfN) partners, collaborating with the wider Northern Powerhouse partnership. The findings of the Review characterise the North's economic position and the drivers underpinning its performance, and identify opportunities where pan-Northern drivers and collaboration can support local activities.

In particular, the Review identifies the North as having four prime capabilities which are highly productive and can compete on the national and international stage, comprising of: the **advanced manufacturing**, energy, health innovation and digital sectors.

However, in order to support further growth, the conclusions of the Review set out the need to support investment and improved performance in a number of critical areas in order to support further growth, including:

- Improved education outcomes and work-based and vocational training;
- Improved graduate retention and attraction, helped by better prospects for skilled, mobile workers to make their careers in the North through good access to opportunities in more than one town/city, and by a good supply of high-quality housing;
- Better commercialisation of university research to the benefit of the North's business base;
- Better management skills, including the uptake of innovation; and
-

Attraction of inward investment by world-leading, international businesses that can bring transformed business practices and access to leading technologies.

Overall, the Review identifies that by 2050, a 'transformed North' which incorporates these measures could create **850,000 more jobs** and **£97 billion more in GVA** than if there was 'business as usual'.

Great North Plan

The Institute for Public Policy Research (IPPR) North and the Royal Town Planning Institute (RTPI) have set out a blueprint for a 'Great North Plan' to support the development of the powerhouse and to provide a joined up approach to economic planning. It is proposed that this should include: an overall vision or the North up to 2050; northern transport, economic, natural assets and people and place strategies; and a prospectus for the North to encourage national and international investors. It is considered that this approach will present a unique opportunity to put forward a dynamic and timely representation of the North and its 'offer', helping to **attract investment** that will help the North to achieve its geographical and social vision.

Transport for the North's Strategic Transport Plan

Transport for the North's emerging Strategic Transport Plan seeks to create: "a thriving North of England, where **modern transport connections drive economic growth** and support an excellent quality of life."

The Plan recognises that the success of the UK in the global marketplace, and the achievement of the Government's Industrial Strategy, depend on the transformation of the economy of the North of England. As a result, it seeks to direct investment to deliver a transport system that is user-centric, smart, autonomous and integrated, as well as resilient and sustainable. Achieving this will allow the North to make a greater contribution to the UK economy through higher productivity and will increase job opportunities across the region, as well as:

Improving competitiveness, rebalancing growth and allowing economic assets to thrive, addressing the long term economic activity gap;

Providing employers and businesses with **better access to a highly skilled and talented labour market, with improved links to the supply chain**, more diverse and cost effective business opportunities and a more buoyant marketplace;

Enabling freight and logistics operators to meet ever increasing demands for smart logistics activities and drive down operating costs, helping to attract additional investment as companies cluster in more accessible locations;

Generating a greater return on investment from public expenditure through **higher productivity and increased economic participation**; and

Providing **access to more work and leisure opportunities**, enhancing the quality of life, and improving living standards and the communities of the North.

The UK's Industrial Strategy

The Industrial Strategy sets out the Government's long term plan to create an economy that boosts productivity and earning power throughout the UK. This includes the need to **build on existing strengths, improving productivity and keeping employment high** to support higher living standards.

Key policies include

- Launching and rolling out Sector Deals – with the first including the **automotive sector**;
- Investing in programmes to capture the value of innovation;
- Supporting investments in transport, housing and digital infrastructure; and
- Driving over £20bn investment in innovative and high potential businesses.

The overall vision is to create:

- The world's most innovative economy;
- Good jobs and greater earning power for all;
- A major upgrade to the UK's infrastructure;
- The best place to start and grow a business; and
- Prosperous communities across the UK.

Summary

The NPPF states that the planning system should proactively drive and support sustainable economic development, including delivering the businesses, industrial units and infrastructure that the country needs.

The 150ha IAMP, including the 61ha IAMP ONE Site, are allocated for approximately 392,000sqm of floorspace for uses relate to the Automotive and Advanced Manufacturing sectors in the adopted AAP. 110ha of adjacent land is allocated for ecological and landscape mitigation associated with IAMP and remains in the Green Belt.

Wider policy objectives include the need to deliver additional employment opportunities in order to: support the growth of the Northern Powerhouse; retain skilled workers; capitalise on the region's strengths in key sectors such as manufacturing, transport and logistics; and supporting inward investment in highly accessible locations close to key transport networks.

National and local planning policy set out a range of policies that relate to design, environmental and technical issues which need to be taken into account in the determination of planning applications. These sections
will be covered in the main section of the report.

COMMENTS:

Members should be aware that this planning application is supported by an Environmental Impact Statement.

The key areas for the consideration for the determination of this planning application are set out below:

1. Principle of the Development;
2. Cumulative Impact
3. Design;
4. Economic Benefits;
5. Transport and Accessibility;
6. Ecology and Biodiversity;
7. Landscape and Visual;
8. Flood Risk Assessment and Drainage Strategy;
9. Heritage and Archaeology;
10. Health;
11. Loss of Agricultural Land;
12. Amenity;
13. Ground Conditions / Land Contamination;
14. Air Quality, Noise and Vibration;
15. Waste;
16. Phasing;
17. Equalities Statement

1 Principle of the Development

The proposed application is a hybrid application that comprises of the following

Hybrid planning application seeking:

Full planning permission for one industrial unit on Plot 3 (21,856sqm) (Gross Internal Area (GIA)) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8), with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with associated access, parking, service yards and attenuation basins, as well as the temporary construction route, internal spine road, utility diversions, with two accesses onto the A1290 and associated infrastructure, earth works and landscaping; and

Outline planning permission for the erection of industrial units (134,984sqm) (GIA) for light industrial, general industrial and storage & distribution (Class B1(c), B2 and B8) with ancillary office and research & development floorspace (Class B1(a) and B1(b)) with internal accesses, parking, service yards, attenuation basins, electricity substations, foul pumping station, realignment of the access road to North Moor Farm and associated infrastructure, earthworks and landscaping. **All matters are reserved for determination at a later stage.**

Assessment of the full part of the hybrid planning application.

Revised details detailed plans (including a site layout plan, as well as elevations, floor plans, roof plans and site sections) have been submitted for Plot 3. This plot lies on the eastern side of the spine road towards the south of the site, at the junction with the A1290. Within this plot, the building is located almost centrally, with an attenuation basin and landscaping adjacent to the site entrance to the north, with car parking (containing 276 spaces including 13 disabled spaces) between the attenuation basin and the building. Land for future expansion is located to the south of the building.

A covered cycle parking area containing 4 covered cycle stands, which can accommodated up to 32 cycles, is located at the north western corner of the building. Electric charging points for 5 vehicles are provided near the staff entrance. Landscaping is proposed around the edge of the plot, whilst a one-way service road is proposed which runs around the plot in a clock-wise direction. The total car parking provision, it is anticipated that 25% of the total provision will be for the use of car-sharing only.

The building will be served by a small service area at the north eastern side of the building, whilst a large service area is proposed at the south eastern side. The proposed development includes a gatehouse.

The revised plans have addressed the issues raised by the Council design team and have resulted in doors/louvers moving to suit the business needs. Due to the location of the site, the proposed unit is considered acceptable in terms, of scale, layout and massing. The proposed colours of the scheme are in broad accordance with the colours set out in the Design Draft Code for IAMP One and IAMP Two and as such the proposed development is considered to be in accordance with policy S2A, S3, D1, EN4 of the adopted Area Action Plan

Detailed plans have been submitted for the access elements of the scheme, including the internal carriageway, the road widening works along the A1290 and a footpath connection along the A1290 to provide a link between the southern site entrance and the existing footpath on the A1290. The principle of the internal road and carriageway works on the A1290 have been

considered by both Highways England and the Local Highways Authority and are considered acceptable in principle. The details of the proposed works and function of the site in conjunction with the strategic highway network and other transportation issues will be covered under the relevant section of the report in more detail. However, the principle of the accesses and internal roads are considered acceptable in principle and as such complies with policies D1,T1,T2 of the Adopted Area Action and policies T14 and T22 of the adopted Unitary Development Plan.

The central green corridor and 4.9ha area of land to the north west are included in the detailed part of the site. The landscape proposals drawing provided in the Landscape and Visual ES Chapter includes this area, whilst details of the drainage design, including a cross-section of attenuation basins. The proposed information has been considered and in principle is acceptable and complies with policies IN2,EN1 of the adopted Area Action Plan. The drainage strategy and landscape and visual aspect will be covered in more detail under the relevant chapters of the comment section of the report.

The proposed plans which have been submitted include the diversion of a Northern Gas Networks 'Intermediate' Pressure Gas main which currently runs north-south through the site and across the proposed location for Units 1 and 2. The proposals are to divert the gas main to a route running north-south through the central green corridor up to the spine road and then along the route of the spine road to the southern site access with the A1290. The proposed diversion has been fully considered as part of the hybrid application and relevant consultations have been carried out with Northern Gas Works and the Health and Safety Executive. No objections have been offered from either consultee.

It is recommended that the applicant works closely with Northern Gas Works to ensure the diversion is carried out in a safe manner In line with the advice the developer has been provided by Northern Gas Works. The proposed division is considered necessary to allow for the safe development of the site. This part of the development needs to be carried out as part of the full planning permission in order to allow the development of the outline part of the site to come forward. The proposed diversion is considered acceptable in principle and as such is considered to comply with the policies S1 and IN1 of the adopted Area Action Plan.

Outline Part of the Application of the Hybrid Planning Application

A series of parameter plans have been submitted to ensure a balance between the need for some flexibility to be maintained to allow the detailed design to be reserved for subsequent approval, whilst defining the key principles of the development in enough detail to allow the likely significant effects of the development to be properly assessed through the Environmental Statement ant to ensure a comprehensive scheme to achieve the key policies as set out in the adopted Area Action Plan.

The submitted plans are consistent with the overarching design principles set out in the draft Design Code , as well as the Design and Assess Statements (Site Wide and Plot 3, these are evaluated in the Environmental Statement using the parameters set out below.

The parameter plans are as follows:

- Parameter Plan 1 'Extent of Development' (drawing number 6247 – 128) – defines the maximum extent of the development plots and divides the site into six development zones. One of these zones, containing plot 3, is subject to full details;
- Parameter Plan 2 'Access' (drawing number 6247 - 129) – this drawing defines the following:

a the route of the spine road, although full details have been submitted for this route. (Detailed drawings have been submitted for the access to Plot 3, which is accessed via the spine road);

b The route of Follingsby Lane which runs north-west to south-east through the site. This route will be closed to motorised vehicles and will become a route for non-motorised users (pedestrians, cyclists and horse riders);

c A pedestrian / cycle route running through the central green corridor and then continuing in a position adjacent to the north-western site boundary before connecting to Follingsby Lane where it crosses the north western site boundary;

d a short pedestrian / cycle link to the section of Downhill Lane which runs along the northern site boundary. This link will connect to the wider Public Right of Way Network, including the Great North Forest Heritage Trail; and

e the access route to North Moor Farm, which travels across part of the north western side of the site. North Moor Farm will only be accessible from the north west along Follingsby Lane. The approach from the south east will be prevented as Follingsby Lane will be closed to traffic.

- Parameter Plan 3 'Landscape' (drawing number 6247 - 130) – defines the location for the landscaping including green corridors, wildlife corridors and screening planting including the routes for non-motorised users, lighting, street furniture, infrastructure, attenuation basins and , fencing. The landscape scheme includes planting around the site boundaries and around the car parking areas. The parameter plan identifies the future land requirement for the dualling works to the A1290 and explains that this land will be maintained as a green corridor in the interim. The central green corridor and the attenuation basins are included in the Detailed part of the site; and

- Parameter Plan 4 'Building Heights' (drawing number 6247 - 131) – defines the maximum height of the buildings within the 'built development zone' as being 25m above the average existing ground level within the development zone. This height includes any plant and machinery.

An indicative masterplan (drawing number 6247 - 143) and Landscape Proposals drawing have been submitted. The Indicative Masterplan provides one example of how the scheme could come forward based on the parameters provided, whilst the Landscape Proposals drawing is based on the Indicative Masterplan. These drawings have been submitted for information purposes only and will not form part of the approved drawings.

Due to the outline nature for the majority of the development, the final position of the individual plot accesses have not been confirmed. However, a standard design for the junction layout is set-out in the Transport Assessment and consists of a 7.3m wide carriageway for each minor arm; a right-turn facility; shared use path in to the development plot; 10m corner radii; and a dropped kerb crossing the junction with tactile paving. Junctions will not be positioned closer that 50m centre-to-centre on the same side of the spine road, or closer than a 25m stagger on opposite sides of the carriageway. The is considered acceptable in principle and as such is considered to comply with the strategic policy and transport policies set out in the adopted Area Action Plan.

The proposed development will provide the following amount of floorspace:

Plot 3

- Gross internal area = 21,856sqm
- Gross external area = 22,348sqm

Outline Units

- Gross internal area = up to 134,894sqm
- Gross external area = up to 137,933sqm

Total

- Gross internal area = up to 156,750sqm
- Gross external area = up to 160,281sqm

The total amount of floorspace is therefore up to 156,750sqm (GIA), which represents the first phase of the IAMP employment allocation of up to 392,000sqm under Area Action Plan Policy S3. The schedule of accommodation on the Indicative Masterplan includes a Gross Internal Area (GIA) figure a 30,800sqm for SNOP. This figure takes into account the future expansion land shown on this plot.

Design/Scale

A draft Design Code, has been submitted as part of the hybrid application by Urbed, it provides the overarching design principles for IAMP and provides pragmatic, flexible guidance for individual plots or buildings within the IAMP.

The Design Code is to be read in conjunction with the AAP (Policies D1, D2, T1 – T4, IN1, IN2 and EN1 – EN4), which sets out the key agreed parameters and a series of strategic policies, design guidelines and masterplan principles. The draft Design Code has been prepared in response to the IAMP AAP Policy S1 (4) (Spatial Strategy for Comprehensive Development) which requires Design Codes to be prepared which demonstrates how the development responds to the criteria provided within this policy. The draft Design Code will be subject to public consultation during the DCO process.

A separate Design and Access Statement, prepared by AJA Architects, accompanies the IAMP ONE planning application for the outline part of the site, whilst a Design and Access Statement has also been prepared by Ian Belsham Associates for Plot 3, given that Full details have been provided for this site. The Design and Access Statements follow the principles of the wider IAMP Design Code and the agreed parameters and strategic policies within the AAP.

Each industrial unit will be of a modern design, set within landscaped plots with the necessary vehicle parking and manoeuvring areas. As the buildings will be operated over a 24 hour, 7 day period, it is likely that the external operational areas will be illuminated during the dark hours to the minimum levels required for their relevant use. The buildings will incorporate the latest design specifications for energy efficiency and the use of sustainable resources.

Access

Vehicular access into the IAMP ONE Site will be from the A1290 via two new simple priority controlled T-junctions, one junction is proposed in the south (to the west of the Nissan site access) and one to the north (to the south-west of the A19 Downhill Lane junction). These two new junctions will be linked by a new single 10.8m wide carriageway (spine road), allowing through traffic through the development and also providing direct access to the individual development plots. The new spine road will incorporate right-turn provisions along its length and will be designed to include shared use pedestrian and cycle facilities on both sides of the carriageway.

Full details have been submitted for the two junctions and the spine road. Additionally, the access to Plot 3, which will be taken from the spine road, is also being fixed as part of this application. The access to the other development plots is not being fixed at this stage and hence is included within the outline part of the site. However, locations of the accesses to the other plots are shown on the indicative masterplan for information purposes and to demonstrate that safe access can be achieved.

- A 3m wide shared use path is provided along both sides of the spine road which ties into the existing provision on the A1290. The shared use path will also provide pedestrian and cycle access into the development plots; and
- Dropped kerbs, tactile paving and pedestrian refuge provided at intervals along the spine road.

Access to North Moor Farm runs through the north western part of the site. Access to this farm will be retained, albeit part of the route will be realigned to follow the north-western boundary of the application. This will result in North Moor Farm only being accessible from the north west along Follingsby Lane. The approach from the south east will be prevented as Follingsby Lane will be closed to traffic.

In addition, localised widening to the western side of the A1290 is proposed. The widening works to the north of the proposed new northern site access junction will facilitate the extension of the two southbound lanes and create additional capacity on the A1290 southbound.

It is envisioned that the majority of the highway works will be delivered under a Section 278 agreement to be entered into by the developer with Sunderland City Council. A small section of the A1290 will need to be widened within the administrative boundary of South Tyneside to the north. These works will also be delivered under a Section 278 agreement. The scope of these works has been discussed with Highways England and the local planning and highway authorities prior to submission of the planning application to the Local Planning Authority.

Landscape

A landscape strategy has been prepared for the site to minimise the impact on landscape character and visual amenity, which includes two green corridors running through the site; landscaping within individual plots and around car parking areas, as well as screen planting around the perimeter of the IAMP ONE Site, wherever possible. A series of attenuation basins are proposed to manage surface water within the site and to provide enhance biodiversity.

The precise landscape details will be agreed at reserved matters via a submission of a reserved matters submission for the outline element of the scheme and via a suitable worded planning condition for the Full section of the planning application

However, the key landscape principles include:

On Site

- Screen planting, comprising indigenous trees and shrubs, will be established around the perimeter of the IAMP ONE Site. The planting will include a percentage of Grey Poplars along with native woodland species. Some Scots Pine will also be included to provide year round screening. The planting will compensate for the loss of plantation within the IAMP ONE Site boundary and will provide screening during the operational period. Planting along the northwest boundary will be limited by the overhead powerlines. Planting below

the transmission lines will be undertaken in accordance with the distribution company's clearance requirements;

- Low bunds will be created around the perimeter of the IAMP ONE Site (where possible). This is to provide further screening of the IAMP ONE development, but it also creates a good growing medium for trees and acts to accentuate the height of the perimeter planting, thus increasing its apparent maturity during the establishment period. The bunds will be constructed of top-soil previously stripped from the IAMP ONE Site;
- The existing retained hedgerows along Follingsby Lane, Downhill Lane, the access track to North Moor Farm (in part), as well as those site boundaries not affected by the future highway proposals, will be augmented with native hedgerow species and hedgerow trees;
- The central spine road will be planted with regularly spaced specimen trees to create an attractive access route and a bold unifying feature through the centre of the IAMP ONE development;
- The verges alongside the spine road and other highways will be sown with low maintenance grass swards, to create a neat mown edge to the roads and footways; with an appropriate wildflower/marginal mix to increase biodiversity and visual amenity;
- Screen planting will be created along the A1290 road frontage. The proposals would accommodate proposed future widening of the A1290 and would be fully integrated with the associated highway works;
- Ornamental tree and shrub planting will be established at the main entrances to the IAMP ONE Site and the individual plots, in order to accentuate the sense of arrival and to highlight the access points for drivers;
- A coordinated range of signage, street furniture and lighting will be used along the spine road and communal areas to create an uncluttered unified style to the development;
- The green corridor containing the attenuation basins, which runs through the IAMP ONE Site in a northwest-southeast direction, will be planted with native trees and shrubs, with ground cover species and wildflower swards alongside a proposed footpath linking to the A1290. Marginal species will be planted around the ponds and seating for workers will be provided at key locations overlooking the ponds;
- To aid landscape integration, new native hedgerows will be planted alongside the realigned section of access track between Follingsby Lane and North Moor Farm (overall there would be an increase in the length of native hedgerow planted compared to the amount removed to facilitate the development);
- The proposed attenuation basins /flood storage area, to be located between the main IAMP ONE development area and the River Don tributary to the northwest of the IAMP ONE Site, will incorporate irregular shaped ponds, scrapes and swales, with areas of marginal planting and wildflower swards suited to damp conditions. The primary aim for this area will be to increase biodiversity and create compensatory wildlife habitat;
- Accessibility to the Great North Forest Heritage Trail will be increased by the provision of a new link for pedestrians, cyclists and horse riders between the site and Downhill Lane; and
- To minimise light intrusion and reduce the prominence of the development at night from the surrounding areas, external lighting along the proposed highways or within the individual plots will be fully cowled, or will be directed downwards/inwards away from the external areas.

Off-Site Planting

It is proposed that off-site planting takes place at the following locations to help reduce the impact of views of the industrial units from the adjacent residential properties:

- Adjacent to the cottage north of West Moor Farm;
- Within the field to east and south of North Moor Farm; and
- Within the field to the east and south of Hylton Bridge Farm and The White House.

It is envisaged that planting would comprise native trees and shrubs appropriate to the locality. The extent of the planting and its proximity to the residential properties would be subject to agreement with the residents affected and would need to take into account the ecological enhancements proposed for this area. This land lies outside the planning application boundary but on land owned by Sunderland City Council.

A Landscape Management and Maintenance Plan, as well as a Habitat Management Plan, will be prepared post outline application stage and there will be a condition requiring the submission of these documents, prior to commencement of the development on site should members be minded to grant consent.

Off-Site Planting

It is proposed that off-site planting takes place at the following locations to help reduce the impact of views of the industrial units from the adjacent residential properties:

- Adjacent to the cottage north of West Moor Farm;
- Within the field to east and south of North Moor Farm; and
- Within the field to the east and south of Hylton Bridge Farm and The White House.

The applicant has proposed that planting would comprise native trees and shrubs appropriate to the locality. The extent of the planting and its proximity to the residential properties would be subject to agreement with the residents affected and would need to take into account the ecological enhancements proposed for this area. This land lies outside the planning application boundary but on land owned by Sunderland City Council.

A Landscape Management and Maintenance Plan, as well as a Habitat Management Plan, will be prepared post outline application stage and there will be a condition requiring the submission of these documents, prior to commencement of the development on site should members be minded to grant consent subject to suitable worded planning conditions.

Ecology

The IAMP includes 110 hectares of adjacent land which will be used to accommodate some of the environmental mitigation required for biodiversity loss within the site. This area, known as the Ecological and Landscape Mitigation Area (ELMA), remains in the Green Belt. The development in this area has been advertised as a departure from the Area Action Plan, due to the need to provided maintenance road within the mitigation area to support the attenuation ponds. The proposed development is not considered to be inappropriate development within the Green Belt as its supporting the function of the mitigation as set out in policies Del2 ,EN1,EN2,EN3, and S1

The designation of the Ecological and Landscape Mitigation Area function is intended to provide a focus for implementing the mitigation and/or compensation for the impacts of the IAMP

development on the area's habitats, species and landscape. The Area Action Plan contains that the precise area within the Ecological and Landscape Mitigation Area that will be needed for mitigation and/or compensation will be proportionate and (together with the specific location of that area) will be determined through detailed environmental assessment supporting an application for consent. The Area Action Plan advises that the extent of the Ecological and Landscape Mitigation Area (ELMA):

- Allows for flexibility in locating mitigation within it;
- Is likely to allow for future mitigation of both the employment areas for IAMP One and IAMP Two
- Therefore demonstrates that there is sufficient land adjacent to the IAMP with the potential to deliver the 'worst case' amount of ecological mitigation necessary for the IAMP, which in turn supports the deliverability of the IAMP AAP.

Area Action Plan Policy EN2 provides guidance on the need to protect and enhance biodiversity. It explains that ecological mitigation measures must be designed in conjunction with landscape and drainage specialists to maximise the ecological value of landscape planting and drainage features. The submitted planning application must include an appropriate long-term Management and Maintenance Plan that will ensure long-term ecological value is maintained. If member's are minded to granted consent it is recommended that this will be conditioned on the hybrid planning application to ensure compliance and the mitigation is delivered at the appropriate times.

The IAMP ONE Site will deliver a proportion of the ELMA (a total of 43.6 hectares, including 4.9ha within the planning application boundary) to satisfy Policy EN2 of the Area Action Plan and. 4.9ha of land have been included in the planning application boundary because these works include engineering operations to create the attenuation basins; whilst the works within the remaining 38.7ha area consist of land management works or the sowing of grasses and planting of hedgerows / trees which do not require planning permission.

The wider 38.7ha of the ELMA land which lies outside the planning application boundary is all within the control of Sunderland City Council and can therefore be brought forward at an appropriate time for mitigation. The delivery of these works can be secured through a planning condition requiring the submission and approval of a Habitat Management Plan on the outline and full planning permission elements. These works will be delivered as part of the contractual agreement between Henry Boot Developments Ltd and IAMP LLP.

The proposals include the following:

- A series of scrapes are proposed as part of the flood compensation measures, but which will also benefit farmland birds and enhance the site for wintering birds. Scrapes are shallow depressions with gently sloping edges, which seasonally hold water. The scrapes and ponds also create connectivity for amphibians and the rough grassland makes provision for barn owl foraging habitat.
- Over 7 ha of on-site native landscaping for biodiversity benefit, including species-rich hedgerows;
- 1500 linear metres of newly created species-rich hedgerow on-site and 3400 linear metres (3.4 linear km) of either created, managed or enhanced hedgerow;
- Over 19 ha of skylark plot habitat, at 2 plots per ha - this is an umbrella species with the largest land requirements;

- Over 9 ha of conservation grazing pasture;
- 2.5 ha of marshy grassland habitat, designed for wading birds, riparian mammals and invertebrates. Wild bird seed crops will be used in the first one to three years to lower nutrients for grassland reversion;
- 2 ha of arable field margins and 2 ha of set aside tussocky grassland, which provides potential barn owl foraging habitat; and In addition, over 2.5 ha of aquatic habitat will be provided within the green corridor running between the industrial units.

The Local Planning Authority in conjunctions with the Council Ecologist have reviewed the submitted information contained with the Phase 1 Extended Survey and Chapter K of the Environmental Statement, a full analysis of the information is covered in the comments section of the report under Ecology and Bio-diversity which concludes that the proposed development does not have any significant adverse impact and that mitigation can be provided both on and offsite to deal with the impact from the proposed development. It is recommenced that suitably worded conditions can be imposed. A section 106 agreement cannot be entered into as the land is within Sunderland City Council ownership and it cannot legally enter into an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) with its self as it would be unenforceable.

Summary conclusion the Principle of Development.

The application was advertised as a departure to reflect the minor development proposed in the Green Belt. The Mitigation works in the ELMA are required to support the functioning of the ELMA and provide necessary management and mitigation works to support the development. The proposed works are not considered to have any adverse impacts on the openness of the Green Belt and are considered appropriate development within the Green Belt. The appropriateness is support by both polices in the Area Action Plan(Del 1and Del2) and the National Planning Policy Framework namely paragraphs 79 and 90.

The proposed development is considered to comply with the policies set out in the adopted Area Action Plan S1 (Comprehensive Development) , S2 (land Use) S3 (Scale and Quantum of Development) and the overarching principle of development as set in the National Planning Policy Framework the 12 'core planning principles' which should underpin plan-making and decision-taking and are considered to contribute to the over-arching aim of delivering sustainable development. Particularly relevant in this case are the principles that development should:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs,
- encourage the effective use of land by re-using land that has been previously developed (i.e. brownfield land),
- always seek to secure a high quality design and a good standard of amenity,
- take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside;
- take full account flood risk and coastal change;
- actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;
- conserve and manage heritage assets in a manner appropriate to their significance, and
- contribute to conserving and enhancing the natural environment

The report below expands further on the key area considered to ensure a satisfactory form of the

sustainable development is achieved.

2 Cumulative Impact

The proposed application is accompanied by a report that has considered the cumulative impact assessment which has considered all relevant major developments within a 5km radius of the site. This report has been prepared in accordance with the Town and Country (Environmental Impact Assessment) Regulations 2017. Chapter O of the Environmental Impact Assessment sets out the key criteria that have been used to assess cumulative impact. A summary of findings is set out below.

In total 34 developments have been considered, 15 developments within Sunderland City Council administrative boundary have been assessed, 4 within Gateshead and 15 within South Tyneside boundary.

The report has assessed the specific highway/traffic capacity consideration, the cumulative effects of the proposed improvements to the A19 Testo's and Downhill Lane junctions, and the proposed renewable energy centre at Hillthorn Farm have been included in the Transport Assessment submitted separately with the current proposal. The consideration and inclusion of these developments has been accommodated in traffic forecast modelling used in the other relevant Environmental Statement Chapters, namely Air Quality (Chapter D), Noise and Vibration (Chapter E) and Access and Transport (Chapter L) as amended.

Within the cumulative document table O2 summaries the key findings of the development within the three areas identified above. The key areas assessed where Air Quality, Noise and Vibration, Cultural Heritage, Water Resource and Flood Risk, Geology, Soil and Contaminated Lane, Access and Transport, Ecology and Bio-diversity, Socio- Economics, Construction , Housing and Amenity.

Of the sites considered there were either no predicted impact or a potential cumulative impact that was considered to be negligible or low. In conclusion there is no significant adverse impact found from the 34 committed developments within a 5km of the IAMP One application site. The findings are all set out in Chapter O of the Environmental Statement.

In conclusion the Local Planning Authority is a satisfied that there are no significant adverse impact from the committed developments with Sunderland, South Tyneside and Gateshead.

3 Design Code and Design and Access Statement

The application is accompanied by a Draft Design Code and Design and Access Statement for Plot 3 (Snop) building.

The Draft Design Codes set outs the key design principle for the development.

Policy S1: Spatial Strategy for Comprehensive Development

The comprehensive development of the IAMP for the principal uses associated with the automotive and advanced manufacturing businesses will be delivered by:

1) Revising the Green Belt boundary to release 150ha of land from the Green Belt.

2) Allocating approximately 150ha of land for the development of principal uses (as defined in Policy S2) in the Employment Areas.

3) Designating approximately 110ha of land as an Ecological and Landscape Mitigation Area to provide for mitigation and/or compensation of the ecological and landscape impacts of the IAMP development.

4) Requiring Masterplans, Design Codes and Phasing Plans to be submitted which demonstrate how development:

i. will meet the objectives of the AAP and will not prejudice comprehensive development of the IAMP;
ii. ensures the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone and established infrastructure;
iii. contributes fully to the delivery of the IAMP as a project of national significance;
iv. contributes fully, in a proportionate and timely manner, towards providing the infrastructure identified in the IDP;
v. contributes fully, in a proportionate and timely manner, to providing for the mitigation required for the IAMP, including environmental mitigation; and
vi. is capable of being implemented without breaching the provisions of the Planning Act 2008.

The design code has been established to ensure compliance with the Spatial Strategy for Comprehensive Development policy S1. The Design Code that accompanies the application is summaries below.

The design code is specifically in draft and it discuss IAMP One and IAMP TWO to ensure comprehensive development is achieved as set in policy S1 of the Area Action Plan.

This Code is issued in draft form to guide development pending formal approval through the process of the emerging DCO for IAMP TWO. The IAMP Area Action Plan 2017-2032 (AAP) was approved by the Secretary of State and adopted by both South Tyneside Council and Sunderland City Council in November 2017.

The AAP set out the vision for IAMP:

‘A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries. A planned and sustainable employment location that maximises links with Nissan and other high value automotive industries as well as the local infrastructure assets, including the ports, airports and road infrastructure.’

The AAP also set out the type of place which the Councils want: ‘an attractive working environment that creates the conditions in which businesses can establish and thrive and where people choose to work. A unique opportunity for increased job and business creation and the promotion of regional prosperity whilst taking advantage of natural assets and green infrastructure including the River Don corridor.’

The AAP contained specific references to the production of a Design

Code: **Policy S1: Spatial Strategy for Comprehensive Development** Part (4) ‘Requires Design Codes to be submitted that will demonstrate how development ensures the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone’; **Policy D1 Masterplan Design** states that proposals ‘must be accompanied by a Design Code for approval by the Councils.’

Section 4 of the AAP sets out the design guidelines and masterplan principles necessary to achieve 'comprehensive delivery of a high quality, internationally renowned business park.'

The draft **IAMP Design Code** has been developed in response to the requirements set out in the Area Action Plan. Covering the whole of IAMP, the Design Code sets out how the design guidelines sought within the AAP will be achieved. The Design Code will be formally signed off through the DCO process.

The diagrams on pages 6-12 demonstrate of the draft design code should how the Design Code is addressing the various requirements set out within the AAP.

The Design Code will offer a greater level of practical detail for developers, architects and their design teams on the requirements that need to be met when putting forward proposals within IAMP.

The Code should be read in conjunction with the Area Action Plan and the Councils' respective Statutory Plans, which sets out the key agreed parameters and a series of strategic policies, design guidelines and masterplan principles to guide the development of this nationally significant development.

What is a design code ?

Design codes are a distinct form of detailed design guidance. (Preparing Design Codes - a practice manual DCLG 2006)

A Design Code is a set of written and graphic rules that establish with precision the two and three dimensional design elements of a particular development or area – and how these relate to one another without establishing the overall outcome.

A Design Code aims to provide clarity over what constitutes acceptable design quality for a particular site or area, and thereby provide a level of certainty for developers and the local community alike. Codes provide a positive statement about the particular qualities of a place, and are focused around those design characteristics that are important to achieve, and they establish and firmly fix the 'must have' design elements.

In so doing Design Codes help to provide continuity in quality and consistency over time.

How the Design Code will be set out.

The IAMP Design Code will help shape development as it comes forward, setting out the broad parameters that should be responded to by development and providing a point of reference for the level of quality that will be expected.

The IAMP Design Code covers FIVE elements:

ONE Masterplan Principles

These cover the overriding concept for the IAMP, which sets out what it should be like and how it should evolve and the broad themes that have informed its development;

TWO Interface Principles

These relate to how the IAMP corresponds with and interacts with its immediate surroundings and setting;

THREE Street Typology Principles

These cover the different street typologies that are being developed within the IAMP, how they will be designed and their nature and quality;

FOUR Plot Design Principles
These relate to how development corresponds with and interacts with its immediate surroundings and relate to streets and spaces within the IAMP through the location of access points, service areas and parking;

FIVE Building Design Principles
These consider the components of the individual buildings, including their design and materials palette, layout and orientation. Taken together, these principles will combine to deliver the aspiration and vision for IAMP, and help to shape a well-functioning, attractive and commercially viable environment.

The application is also accompanied with a Design and Access Statement for IAMP One prepared by aja architects.

Design and Access Statement for IAMP One

AJA Architects LLP have been appointed by Henry Boot Developments Ltd to act as Master Planning Architects for a proposed development on land to the north-west of Sunderland, known as IAMP ONE.

This Design and Access Statement is in response to the IAMP Area Action Plan that has been adopted by Sunderland City Council and South Tyneside Council, to guide the comprehensive delivery of the overall IAMP development, a high quality strategic employment development targeted at automotive and advanced manufacturing end users.

URBED, the master planners for the wider IAMP scheme, has produced a draft Design Code Document, in response to the IAMP Area Action Plan and which is intended to provide pragmatic, flexible guidance for individual plots and buildings within IAMP.

Constraints

This is a complex site with many constraints and challenges, which can be summarised as follows:

- Location of the new junctions with the A1290 is constrained by existing access to Nissan and other existing highway junctions.
- The nearby River Don with its associated flood risk and ecological constraints.
- The proximity of existing adjacent residential premises, particularly West Moor Farm, Hylton Bridge Farm and Usworth Cottages.
- The existing line of Follingsby Lane which bisects the site.
- The need to create attenuation reflecting the drainage characteristics of this site.

- Existing above and below ground services which will need to be diverted as part of the development.

- Existing overhead power cables, with their constraining sag and sway characteristics and associated pylons. Within the generally flat landscape, views from the neighbouring area will require careful consideration with respect to site layout, scale and general building design.

- Impact on existing ecology, including loss of habitat for bats and birds.

- Need to respect the setting of the nearby listed bridge structure.

- Need to work effectively alongside the existing Nissan Plant, with its associated patterns of peak traffic flow.

- The need to bring forward associated utility infrastructure, including power, to bring the site forward.

Opportunities

- At 61 hectares the site covers a substantial area and is capable of accommodating a significant advanced manufacturing development.

- The way in which the site is broken into the various plots due in part to the constraints described above, naturally provides opportunity for development of differing size and scale.

- The proximity of the existing Nissan Plant creating the opportunity for complementary development.

- The proximity of the A19/A1290 junction provides an excellent opportunity to enhance the connectivity of the site to the local, regional and national road network, opening up the site and offering the potential of a development of strategic importance

- The IAMP ONE ELMA land (see 7.1 below), incorporating the enhanced ecological corridor to the River Don, provides the backbone of the wider ecological mitigation strategy. Linking this with structural landscaping around the site perimeter, particularly along the northern and western boundaries, Follingsby Lane and the central green corridor containing the attenuation features, can create important wildlife connectivity around and across the site.

- Follingsby Lane and the central green corridor containing the attenuation features provide natural opportunities to break up the development within the site and create a strong network of new footpaths and cycleways into and across the site, away from the estate road infrastructure. This will provide connectivity via green links and will be of amenity value to both site users and the local residents alike.

This documents has set the parameters of the development, which ties in with IAMP Two

Fig 25. Extent of Development Parameter Plan

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The document aims to set out how the site could be developed by using suitably worded conditions should members be minded to grant consent in order to comply with policy S1 of the adopted Area Action Plan.

Fig 31. Indicative Landscape Proposals

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Design and Access Statement in respect of Plot 3 (Snop)

A comprehensive design and access statement has been submitted to support the planning application.

This statement should be read in conjunction with the following drawings.:

- Proposed Site Plan
- Proposed Surface Finishes Plan
- Proposed Site Sections
- Existing Site Plan
- Proposed Building Plan
- Proposed Elevations
- Proposed Roof Plan
- Proposed Office Plan & Elevations
- Proposed Gatehouse Plan & Elevations
- Condenser Compound

The design objectives include for the proposed unit 3 are as follows
:

- to provide a modern manufacturing facility with associated office accommodation to meet the current and future needs of the client
- to produce a building of high quality design and construction that sits comfortably in the context of its location
- to design a building embodying the principles of sustainable development that can be constructed with minimal disturbance to neighbours and local amenity.

The new development will:

- significantly reduce travel time and commuting between sites and therefore increase productivity
- reduce their carbon footprint
- centralise operations locally
- offer a flagship building embodying a sustainable ethos

The development is for a new production facility which meets the requirements for a high quality automotive and advanced manufacturing development.

The development is to comprise of approximately 20,368 sq.m GIA of Class B2 manufacturing facility with approximately 1488 sq.m GIA of associated offices in a separate building with corridor links. The site will also accommodate a future expansion, if required, up to 8,944 sq.m.

The main manufacturing building will be approximately 19.0 metres high (above the FFL of 36.50) over the Press Hall area, with the remainder of the building generally being circa 10.0 metres, and the office building circa 6.0 metres high.

In order to fully understand the proposal it must be read in conjunction with the aja architects Design and Access Statement for IAMP One, a summary of the constraints and opportunities is summarised in the section above.

The site is to be accessed from the north of the site from the new internal estate road to be formed as part of the infrastructure works undertaken for the IAMP ONE site. The new access will offer vehicle, cycle and pedestrian access from the internal access road and will be controlled by a new Gatehouse located within the site.

As mentioned in the IAMP ONE Design & Access Statement prepared by aja architects there are a number of bus services which will run along the adjacent roads providing public transport to the site.

Access to the building from the car park will be level and unobstructed with drop kerbs and tactile paving provided at required locations. The internal parking areas and pedestrian routes will be provided with suitable lighting to ensure safe access to the building for the visually impaired. There are 13 no proposed accessible parking bays located adjacent to the main entrance and these are clearly marked complete with transition zones. In addition there are 5no Electric Vehicle charging points located adjacent to the staff entrance.

The proposals will provide a total of 276no parking spaces based on the total number of employees and shift patterns operated by the applicant. Parking will have a tarmac finish with white lines to demarcate the parking areas and yellow hatching to demarcate accessible spaces and transition zones. Paving to the front entrance and around the perimeter of the building will offer pedestrians safe access throughout the site and into the building. Crossing points will be located at designated locations complete with drop kerbs
and blister paving.

Four covered cycle stands will be provided to the west of the office building and will accommodate up to 32 cycles. The cycle shelters are conveniently located close to the office and staff entrances and will be well lit to allow safe access to the building

The site has been designed to keep the service vehicles separate from cars within the development. There is to be one access / egress point to the site and the site layout has been designed to provide a one way system around the site. There is a Gatehouse at the entrance to the site, which will control all vehicles entering the site with the aid of controlled barriers, and this is where cars and service vehicles will separate. The car park is located at the front of the site minimising the distance cars will need to travel within the site. The service vehicles will be taken around the perimeter of the site on a one way system where they will access service yards, which provide sufficient space for the vehicles to manoeuvre. The tracking of vehicular movements has been tested and documented by Systra in a separate document submitted as part of the application (Systra drawing Ref IAMP_ONE-SYS-HGN-2C3-DR-01-901-S1-P01).The main service doors will be located on the west elevation of the building and will be dock leveller type service doors

Landscaping

An indicative landscaping proposal is set out on drawing 1405(S)02 A2, and will take reference from the overarching landscape proposals in the final design.

Appearance

The external appearance of the building follows the principles of the corporate image of SNOP buildings, being of high quality as developed in other parts of the world.

There has been a strong and coherent approach to the façade treatment to provide a building which is simple, legible and uncluttered, using different cladding types, colour and

articulation to provide a modern appearance.

The principle façade to the north of the building is where the office building is located, thereby also providing active frontage. The office building will be finished in flat panel cladding, with aluminium feature windows and curtain walling to the main entrance, emphasised with a higher roof and clearstory glazing. The cladding to the office building is to be finished in the corporate blue colour giving it a clear identity and providing hierarchy to make the building legible as you enter the site, as can be seen on drawing 1405(0)02. The office building has been brought forward away from the main production building to emphasise its importance. The main building is set back but does benefit from a large corporate 'SNOP' sign to signify its importance as the principle façade. The sign is illustrative at this time and will be subject to a separate advertisement consent application.

The secondary façades to the building will be finished in horizontally laid profiled cladding in a silver colour providing a backdrop for the office building. These façades will also benefit from areas of translucent panels at both low and high level to break up the façade and provide good quality light into the building. A parapet detail has been utilised on all elevations to conceal the roof pitch, thereby providing clean horizontal lines around the building to provide a modern appearance. Service doors and personal doors will be finished powder coating in the blue corporate colour, which make the secondary façades very legible. The principle loading bays with dock levellers are provided with a large cantilevered canopy providing shelter but also helping with the legibility of the building.

Good quality signage will be provided at the entrance to the site in accordance with the overarching Design Code for IAMP, providing good directional signage to visitors approaching the site from either direction on the internal estate road enabling them to enter the site safely at the access point. The building signage can be seen on drawing 1405(0)02 A2 which is the brand signage adopted on all SNOP buildings throughout the world. This signage is very clear and legible from the internal estate road, the site entrance and the car park. Smaller localised signage will be provided to guide visitors to the building entrance.

Energy Efficiency and Sustainability

The approach to sustainable design will be followed to minimise environmental impact and this will involve:

- Reducing demand
- Meeting that demand efficiently
- Consideration of low carbon technology
- Supply from renewable energy sources

To further reduce demand the building will incorporate rooflights (circa 10% of the roof area) to the production areas and appropriate areas of glazing to the offices, in order to maximise the natural daylight and limit the reliance upon artificial lighting. LED fittings with high quality control gear with a long life expectancy will be used as well as presence sensing and daylight controls to further minimise energy use. The residual heating demand will be met by the application of efficient system selection heating plant and automatic controls. New heating elements will be individually controlled and zoned where appropriate
depending on the operation and activity.

The use of reclaimed and recycled materials within the construction process will be considered in the early design stages, and materials considered for their aesthetic qualities, recyclability, robustness, value and availability.

The new building will be fully DDA compliant with appropriate parking spaces provided, as well as level access paths to the building and all entrances and exits designed with level thresholds. The main entrance doors are to be automatic doors and will provide the clear access required for DDA purposes. Internal doors to all areas except standard wc's are 926mm wide providing a clear opening width of at least 800mm and are positioned so there is a 300mm zone on the pull side from any return wall.

Summary Conclusion on Plot 3

The proposed development of Plot 3 on the IAMP ONE site has considered the principles set out in the draft Design Code for the IAMP site. The principles for the design of the plot and the building are listed below.

Landscaping

The landscaping to the plot will provide tree and shrub planting, with particular consideration given to the site boundary to the spine road. The intention would be to minimise the impact of the boundary and provide some element of screening to the building. The attenuation pond has been located at the north of the site, providing a buffer between the spine road and the parking areas, and will also provide a softer approach
around the curve of the road into the wider IAMP site. The tree and shrub planting will include evergreen species to provide year round screening.

Area / Plot Lighting

Lighting will be provided to the site and used to highlight in particular the entrance into the site, the parking areas and the route for pedestrians into the building. In the design of the site layout the service yard areas have been kept away from the ecological corridor to reduce unwanted light pollution across the landscape.

Parking

The visitor and staff parking areas have been kept to the north of the site, as close as possible to the primary frontage of the building providing good access for all and natural surveillance of the parking areas. Electric vehicle charging points and cycle parking areas are conveniently located close to the building and will carefully illuminated.

Servicing

The servicing areas have been located on the west side of the building to minimise the noise and disturbance to the wildlife corridor to the east of the site. A separate service road as been provided to keep the movement of larger vehicles away from the visitor and staff parking areas to avoid any unnecessary conflict. The main refuse areas are via skips located within the Scrap Area and will be fully enclosed.

Building Design Principles

Façade Treatment

The main building will be finished with horizontal profiled silver cladding to provide a neutral background against the skyline when viewed from a distance. Colour has been used to emphasise the office building providing interest and legibility when viewed closer up. The main façade faces onto the primary spine road.

Active Frontage

The office building provides an active frontage where both the main entrance and staff entrances will be located. The main entrance will be glazed and will benefit from a raised roof with clerestory glazing providing legibility and reinforcing the sense of arrival to the building.

Signage

Good quality signage will be provided to the site and the building which will be legible, with its size, type and location being appropriate for its function. All signage will be appropriately lit and will provide good wayfinding for, servicing vehicles, staff and visitor vehicles as well as pedestrians using the site.

Building Lighting

Lighting will be provided to emphasis the key elements of the building, particularly the entrance in order to help its legibility and its prominence. The lighting levels will be at the appropriate levels whilst not adding to the overall glare, and will include both uplighting and downlighting to pick up features of the building.

Sustainable Design

The building has been designed to provide an attractive working environment that creates the right conditions to provide an attractive place to work. There is a strong emphasis in the design for natural lighting into the building which has been maximised in both the roof and the walls. The roof will benefit from a shallow dome type rooflight providing a far higher quality of natural light into the building than the typical industry standard rooflights. The building will also benefit from glazing to the walls at both low and high level. The significant provision of natural lighting will not only create an attractive working environment but also reduce the energy demands on the building.

Following the design comments made to the applicant it is now considered that the revised Design and Access Statement received 22nd March 2018, supporting letter and revised drawings have addressed the concerns and as such the proposed development of plot 3 is considered acceptable in terms of design.

The document clears sets out design principle being proposed for the IAMP One and IAMP two. In respect of the full element of the scheme the revised plans for the proposed development are now considered to be in compliance with the key draft design code principle set out. In respect of the outline aspect of the scheme as all matters have been reserved it is vital that should members be minded to grant consent that a condition is imposed on both elements of the scheme to ensure compliance with the draft design code in order to comply with policies S1 , S3, D1,D2,T1,T4,IN1,IN2,EN1,EN2,EN3,Del1 of the adopted Area Action Plan.

4 Economic Benefits

Chapter M of the Environmental Statement (Socio-economics) sets out the policy context of the proposed development.

The key policy documents which support this document are detailed within the site and context element of the report detailed above.

The comprehensive document covers key areas that need to be considered as part of the Environmental Statement. The document has set the context in terms of baseline conditions for the proposed development, and then considered potential effects from the proposed development, then analysing and mitigation and monitoring as required.

Summary conclusion on the socio-ecomonic chapter of the Environmental Statement.

The IAMP One development proposal allows for the provision of upto 156,750 m2 of employment floorpspace (Gross Internal Area). IAMP One is the first phase of the wider comprehensive development of the site, it is a central proposal within the Sunderland City Deal, which is intended to underpin the continued success of the automotive and advance manufacturing sector in the North East.

In addition to the wider strategic and profiling benefits of the development, IAMP One is expected to have a beneficial effect on the local economy by:

Creating new construction (and supply chain) jobs – as well as additional economic output – during construction. Whilst some existing jobs within IAMP One site may be lost during construction, it is expected that they would be more offset by those to be created.

Delivering new office and manufacturing floorspace, which will be created substantial employment opportunities and an uplift in the economic output during construction.

The IAMP One proposal will also have a beneficial effect in relation to amenity during operations, with Follingsby Lane closed to vehicular movement in order to create a landscaped route through the planning application site for non-motorised users (including pedestrians, cyclists and horse riders) which would be open to the public.

If members are minded to grant consent, during the operational stage of development the proposal is expected to create an increase demand for housing, as workers move into the area of interest to take up employment opportunities created by the planning application. This could give rise to a minor adverse effect in the event that the levels of housing delivery planning by the City fail to meet the housing needs associated with IAMP One, it is not possible for the applicant to mitigate for this possible outcome.

Summary Conclusion on socio-economics section of Environmental Statement

Overall, the proposed benefits from the planning application have been fully assessed and are considered as having a permanent and beneficial effect from a socio-economic purpose. As there are no significant adverse impacts associated with the socio-economic benefits, its is considered that the proposed development is compliance with section 2 of the adopted Area Action Plan, policies S1,S2 and S3 as well as paragraphs 7,8,18,19 and 20 of the National Planning Policy Framework.

Transport and Accessibility;

The application is supported by a range of documents listed below, which address the traffic and transport implications of the proposed development.

- Environmental Statement Chapter L – Access and Transport
- Transport Assessment
- Framework Travel Plan
- Car Parking Strategy
- Outline Delivery and Servicing Strategy
- Outline Construction Traffic Management Plan
- Stage 1 / 2 Road Safety Audit
- Transport Addendum

Assessment of Traffic Impact

The comments contained within this note relate to the Transport Assessment Addendum dated 15th March 2018 which seeks to address the queries and issues raised within the original Local Highway Authority consultation response dated 19th February 2018.

As part of the query raised with regard to traffic movements through the A1290 / Nissan access and requirement for additional junction testing. The Addendum to the Transport Assessment includes further testing based on all IAMP ONE arrivals from the A19 Downhill Lane junction which equates to 67% of all IAMP ONE development trips, which is considered a robust approach. The testing demonstrates that this junction can operate without any significant capacity issues. This issue will be addressed by the delivery of the new spine road, and is considered to be acceptable. Further assessment is covered in the Air Quality, Noise and Vibration comments section of the report.

Committed Development

There have been no changes in the committed development requirements since submission, which for clarity include Turbine Business Park, the Hillthorn Farm Enterprise Zone, with the addition of traffic generated by the proposed Renewable Energy Centre. As per previous comments, the latter is not a committed development, however this effectively is a double counting of traffic numbers to ensure a robust assessment of the road network.

Trip Generation

To ensure that the new trips generated by IAMP ONE can be accommodated on both the local and strategic road network the applicant has assessed traffic movements based around Nissan shift changeover times; which are the time periods where traffic levels increase significantly and queuing and congestion issues occur. This is evidenced by queuing on the A19 off-slip with the Downhill Lane junction.

Following the submission of additional evidence, it is considered that a two hour offset is not necessary. Over a 24 hour period, the critical time identified is the Nissan shift change over period which peaks at 6.30am for a 7.00am shift start. Based on this as worst case, a one hour

offset applied as a minimum requirement based around shifts operated by Nissan will provide the necessary capacity on the local road network.

This requirement is in addition to the 300metre section of road widening on the A1290 which will need to be completed prior to the occupation of any unit and is necessary to ensure that no additional queuing occurs on the A19 off slips; which would be considered a severe impact in terms of highway safety. As such, the agreement and implementation of an Highway Operational Management Plan will be key. This requirement will need to be conditioned and must be agreed prior to the occupation of any unit.

Proposed Development

Vehicular Access

Previously concerns were raised regarding the spacing of vehicular access points along the new spine road. The applicant has advised that the junction positions may change as part of future reserved matter applications, and expect the number of vehicular access points may reduce. This will overcome the issue of the junction spacing not meeting with recommended guidance.

It was previously recommended that both new junctions include for the installation of ductwork and chambers to enable the provision of traffic signal control. These details can be submitted as part of the technical approval for the detailed highway design.

The delivery and completion of the new spine road will be required to support the full IAMP ONE proposal. Completion and opening of the road to traffic will need to be determined and agreed at the outline stage to enable delivery of all of the nine units shown on the indicative master-plan. The first unit could potentially be accessed via the proposed western junction. A condition should be included to confirm the programme of works for delivery of the new spine road.

Parking Provision

A Car Parking Strategy has been submitted for consideration. Sunderland City Council guidance has been considered as well as national guidance (NPPG) which allows parking provision to be based on operational requirements and needs of the end user. This is considered acceptable in principle but will need to form part of any conditions relating to site operations and implemented in association with the Delivery and Servicing Strategy.

Each car park will need to provide Electric Car Charging Points. The specification and management of charging units will need to be agreed. This should be addressed in conditions for both the Framework and fully detailed Travel Plans.

Proposed Unit 3 (SNOP)

Previously, it was advised that SNOP sign up to an Highway Operational Management Plan which will specify specific shift pattern arrangements offset to NMUK shift pattern change over times. Currently, this will need to be applied to all units located within IAMP ONE, until the wider infrastructure proposals for IAMP and Downhill Lane are delivered. After which, the Highway Operational Management Plan condition can be reviewed.

Following the submission of additional evidence, it is noted that the parking provision for unit 3 is within development trip generation parameters and therefore considered to be acceptable.

Additional information provided by the applicant advises that the extension to Unit 3 identified for occupation by SNOP is for operational use only. The Transport Assessment for IAMP ONE considers development trips based on maximum floor area. Any potential change to Unit 3 in relation to end-use will need to incorporate development trips associated with the remaining units.

Drawings have been supplied to demonstrate that HGV routing can be achieved within the plot layout. This is considered to be acceptable.

Follingsby Lane

Following the submission of the planning application discussions have taken place with representatives from the three Local Authorities (Sunderland, South Tyneside and Gateshead) and Nexus. During these discussions it was agreed that wider public transport improvements need to be part of the strategic proposals associated with future phased development through the IAMP Development Consent Order

Follingsby Lane has the potential to serve as a new bus route but will require investment to improve the road surface condition of the existing highway corridor and provide facilities to accommodate bus movements and localised widening where achievable. The potential bus route option will need to be considered in more detail, however if this option is not achievable then the route should be promoted as a sustainable transport link for pedestrians, cyclists and equestrian users.

A Traffic Regulation Order is proposed to the eastern leg of Follingsby Lane connecting to the A1290. This proposal is supported, although further discussion will be required as access will need to be retained for local residents and landowners, emergency services, highway maintenance vehicles and potentially buses. Access can be maintained for pedestrians, cyclists and equestrian users. This is a separate statutory process and would only be progressed post-planning application.

Outline Delivery and Servicing Strategy

An Outline Delivery and Servicing Strategy has been submitted for consideration. The Delivery and Servicing Plan for IAMP ONE considers freight movement by HGV only. This is considered acceptable in principle but will need to form part of any conditions relating to site operations and be implemented in association with the Car Parking Strategy.

HGV Movements and Lorry Parking

As previously stated, businesses locating within IAMP ONE will need to incorporate lorry and trailer parking associated with their logistic operations. This will need to be adjacent service yards to allow short stay parking for waiting prior to unloading or reloading with goods. These facilities will need to be different for each unit and tailored to suit the needs of the business. This requirement is important to ensure no lorry parking takes place on the public highway or in nearby areas.

All HGV turning movements and HGV parking will need to be accommodated on site within dedicated hard-standing and lorry parking areas located in each plot. Based on the footprints of

the units sufficient parking and manoeuvring space is provided to accommodate short stay HGV parking within each site.

A dedicated HGV parking facility is unlikely to address the wider issue of lorry parking (which is a local, regional and national issue) and may result in attracting HGV from across the region as no other local authority across the region provides such a facility.

The issue of lorry parking and associated anti-social behaviour by some HGV drivers is an issue which has been raised in the Washington area and further afield. This planning application only considers HGV movement to and from the development site and HGV access within each plot. Appropriate hardstanding and short-stay parking is provided for unloading and loading operations only. Any HGV activity and parking outside of IAMP ONE either before or after these operations is outside the scope of this application. However, it is expected that occupiers of IAMP ONE will be in a position to control HGV movements by freight operators directly employed by unit occupiers. This can be managed through a detailed Delivery and Servicing Strategy, and conditioned accordingly.

Refuse storage will need to be provided within the service yard area for each unit. Vehicle trips associated with collection arrangements are expected to be minimal. A condition will be required to agree details of refuse and recycling storage to be implemented prior to the occupation of any building.

Traffic Management

Following the submission of the planning application, it has been agreed that the applicant IAMP LLP and Henry Boot Construction will be best place to coordinate a Traffic Management Working Group to assist with managing the various stages of construction both on and offsite. It is recommended that Nissan and key suppliers be represented at this group.

A contact within the Network Operations team within the Council will be nominated, and be part of the Traffic Management Working Group.

It is noted that a Clearway Order is proposed under the Road Traffic Regulation Act to prohibit stopping, loading and parking on the spine road. This requires a separate statutory consultation procedure outside of planning. It is noted that the intention is to introduce the Clearway Order upon opening of the spine road to traffic.

Road safety

There are no further comments to address on road safety issues associated with the A19 and its junctions with the local road network, as these issues are to be addressed by the highway improvements to the A1290 and the implementation of an Highway Operational Management Plan. These will be required prior to the occupation of any unit.

Road Safety Audit

A Designer response to the Road Safety Audit is awaited, and can be progressed outside of the planning application process. This will be expected to consider the issues raised around landscaping and tree planting currently proposed to either side of the spine road. Specific issues

relate to forward visibility along the road alignment and inter-visibility at the egress from side junctions serving as plot accesses. The extent of tree planting proposed will be likely to have an impact on safe operation of the highway.

It is expected that the Audit will make recommendations on the detailed design and layout of non-motorised user crossing points along the A1290 corridor. The footway / cycleway improvements will need to be covered by condition and be implemented to provide appropriate non-motorised user accessibility for the occupation of units.

Road Traffic Noise

Environmental Health officers have been consulted on the development proposal, in relation to air quality and noise generated through increased traffic flows. The additional development generated traffic has been checked to assess the changes in traffic flows for the A19 corridor and link roads. This is to establish locations where any changes in traffic flow could exceed threshold level for noise attenuation where flows are predicted to increase by 25% or greater. A small number of locations have been identified where road traffic does exceed noise level triggers (where change is greater than 1 dB), which are mainly located along the A1290/Cherry Blossom Way.

Most of these locations are non-residential. However, a potential issue with nearby residential properties at Seven Houses has already been addressed by a realignment of the A1290 in proximity of these houses which has effectively removed any direct impact.

In summary, none of the identified locations are predicted to experience an increase of more than 1.9 dB and as such the traffic related noise impacts are not considered to represent a significant adverse effect.

Public Transport Strategy

As previously commented, the application includes for improvements to existing bus stops with new footway links and bus shelter provision. Subject to this being provided, this is considered acceptable as the minimum standard to serve the first building (unit 3). The proposed bus stop improvements for IAMP ONE are appropriate based on anticipated bus patronage arising from the units associated with this application. Consideration has also been given to maintaining existing bus patronage and established bus routes on the A1290 serving Nissan.

A Public Transport Strategy will identify when wider measures need to be introduced to meet the needs of staff employed on IAMP ONE and existing public transport users. The applicant recognises the importance of improving and where possible providing new public transport links for the IAMP workforce. It is recognised that further work will be required as part of the IAMP Development Consent Order process. This is also needed to meet with the requirements of the Area Action Plan and this approach is supported. It is recommended that a condition be included to agree initial requirements of a Public Transport Strategy as part of the outline application.

Pedestrian and Cycle Accessibility

The new spine road includes 3metre wide shared use footway/cycleway provision. Pedestrian refuges are to be installed to provide safe crossing points. It is recommended that the provision of

improved footway and cycleway connections with the A1290 be a condition, which will need to be delivered prior to occupation.

Each plot will need to include facilities to promote access by cycling. Cycle hubs will need to be integral and form part of transport hubs serving the wider IAMP development. It is recommended that the provision of cycle facilities form part of conditions for the Framework Travel Plan (outline permission) and detailed Travel Plans for end use occupiers (full permission).

Public Rights of Way

There are no further comments to address on Public Rights of Way. There are no registered public rights of way across, or routed directly through the development site.

Framework Travel Plan

It is recommended that if members are minded to grant consent conditions should be imposed as part of the outline application to state that no development shall be brought into use until a final version of the Framework Travel Plan (FTP) has been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The FTP shall include:

i. details of appointment of a Travel Plan Coordinator for the full IAMP ONE development;
ii. an undertaking of an initial baseline travel survey within six months of occupation of each building, with a full Travel Plan adopted within 12 months of occupation, to submitted and agreed subject to the satisfaction of the Local Highway Authority;
iii. a scheme for the provision of cycle parking facilities for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the cycle parking facilities shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority; and
iv. a scheme for the provision of electric vehicle charging point infrastructure for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the electric vehicle charging points shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority

Leamside Line

The Leamside line is located immediately to the western boundary of the proposed development. There are no further comments to address.

Highway Operational Management Plan

It is recommended that conditions be imposed on both the outline and the full permission in that no development shall be brought into use until a detailed Highway Operation Management Plan has been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The Plan shall include full details of shift working

patterns to be implemented and be based on highway network requirements for both the strategic road network and the local road network.

Highways England has also recommended that no building shall be occupied within any part of the site until a Highways Operational Management Plan covering any Use Class B1(c), B2 and B8 operations has been submitted to and approved in writing by the Local Planning Authority in liaison with Highways England. The Highways Operational Management Plan shall include but not be limited to the shift change times associated with all Use Class B1(c), B2 and B8 operations. The shift change times for occupiers within the IAMP One development will need to be off-set by at least one hour from those used at Nissan in the morning and afternoon periods. The shift change time restriction will apply to all Use Class B1(c), B2 and B8 operations for a temporary period until the improvement works to the A19 at Testo's and Downhill Lane are completed and operational.

Outline Construction Traffic Management Plan

A condition should be introduced to manage the movement of HGV traffic directly associated with site clearance and topsoil material removal operations. Full details of how construction plant and contractor traffic are to be managed will need to be addressed by this condition.

These vehicle movements should be restricted during times of Nissan shift changeover time periods. The two Nissan shift changeover times are specifically identified as these are the peak periods where demand for the road network is at its greatest.

No development shall commence until full details of a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The CTMP shall include:

i. Routing of movements including details of any abnormal loads;
ii. Contractor parking and site compound arrangements;
iii. Measures to prevent debris being displaced onto the highway;
iv. Details of any temporary highway / rights of way closures and alternative routes;
v. Temporary traffic management and site access control measures; and
vi. Site security and contract details.

Any site operations and activities associated with the periods for construction (excluding deliveries) shall only be carried out between 0700 hours and 1830 hours on Mondays to Fridays, only between 0800 hours and 1400 hours on Saturdays. Any deliveries associated with the periods of construction shall only take place between 0800 hours and 1430 hours and between 1700 hours and 0600 hours on Mondays to Saturdays. No construction work or construction related deliveries should take place on Sundays, Bank Holidays or Public Holidays.

Highway Drainage

There are no further comments to address. However, details of offsite drainage connections within public highway will need to be agreed along with temporary traffic management arrangements.

Key Consultation Responses

Highways England Consultation Response

In a letter dated 19th February 2018, Highways England provided a positive response on the basis of a number of conditions being imposed in relation to the delivery and operational requirements of IAMP ONE. This also includes future network capacity improvements proposed for major schemes at the A19 Testos and A19 Downhill Lane junctions.

The agreement of an Highway Operational Management Plan is a key requirement which will need to be introduced in relation to any operation falling under a B2 use-class. This includes a recommendation to off-set IAMP ONE shift change by a minimum of one hour prior to Nissan shift change over times. This requirement is considered to be key principle to ensure that the operation and safety of the A19 strategic road network is maintained at this location.

Highways England recommends that the Highway Operational Management Plan for IAMP ONE be an in-perpetuity requirement. However, it is considered that this position can be reviewed once the wider IAMP infrastructure and Downhill Lane major highway scheme is implemented.

Concerns have also been raised about elements of the Outline Construction Plan. These include construction phasing, works programme, management and volume of construction site traffic, abnormal load requirements, use of laybys on the A19 and ensuring that site traffic does not impact on times of peak demand on the strategic road network.

Other comments relate to the inclusion of a Car Parking Strategy as part of the Framework Travel Plan to promote measures to reduce single car occupancy. Comments are provided on bus provision. As part of the Road Safety Audit, Highways England recommend that the A1290 / Downhill Lane West junction be maintained to allow full movements with southbound right-turn ban, instead of the proposed left in / left out arrangement.

Highways England has recommended five conditions be imposed.

SCC Highways Response - The details of an Highway Operational Management Plan will need to be agreed prior to the commencement of any significant site based activities. This Plan will relate to operational end use of IAMP ONE.

However, the same restrictions will need to be applied during the site clearance and construction phases to manage HGV movements particularly during earthmoving operations.

Highways England comments on the Framework Travel Plan and bus provision are noted and addressed in detail within the South Tyneside and Nexus responses. However, the concerns raised can be covered by suitably worded planning conditions.

The recommendations on the Road Safety Audit are to be addressed upon review of the designer's response.

Highways England Recommendations for Conditions –

<u>Condition 1</u>

Condition 1 -- The site shall be delivered in accordance with a Construction Traffic Management Plan, founded on the Outline Construction Traffic Management Plan submitted with the

application. The Construction Traffic Management Plan is to be agreed in writing with the Local Planning Authority in liaison with Highways England. No deviation from the agreed Construction Traffic Management Plan shall be permitted without the express written agreement of the Local Planning Authority in liaison with Highways England.

SCC Highways Response - Noted and agreed

Condition 2

All uses falling within Use-Class B2 shall operate in accordance with an Highway Operational Management Plan. No operation falling within Use-Class B2 shall be permitted to come into use until the Highway Operational Management Plan is agreed in writing with the Local Planning Authority in liaison with Highways England. The Highway Operational Management Plan shall include but not be limited to specifying the shift change times that all Use-Class B2 shall operate. No deviation shall be made from the shift patterns detailed within the agreed Highway Operational Management Plan without the express written agreement of the Local Planning Authority in liaison with Highways England.

SCC Highways Response – Highways England are of the opinion that the Highway Operational Management Plan is to remain in perpetuity, however the need for restrictive timings to be applied can be reviewed once other highway improvements are implemented including future works to dual the A1290, the completion of the A19 / Downhill Lane Major Highway scheme by Highways England and delivery of infrastructure associated with the wider IAMP development.

Condition 3

No development pursuant to the application shall be permitted to come into use until the Framework Travel Plan submitted in support of the application is developed further and agreed in writing with the Local Planning in liaison with Highways England.

Condition 4

All individual end users are required to operate a Travel Plan developed in accordance with the agreed Framework Travel Plan. The Travel Plans are to be agreed in writing with the Local Planning Authority in liaison with Highways England.

SCC Highways Response - The Framework Travel Plan will need to cover all of the IAMP ONE development with a central Coordinator. This is considered essential to ensure that all plot occupiers follow similar approaches and avoid any disjointed approach.

Initially a detailed Travel Plan will need to be agreed and adopted for SNOP as part of the detailed consent sought as the proposed occupier of unit 3. Further Travel Plans will be occupier related and will need to be agreed in association with planning applications at the reserved matter stage. It is recommended that the Travel Plans be implemented using the Sunderland City Council adopted travel plan monitoring system.

Condition 5

No development pursuant to the application shall be permitted to come into use until a Public Transport Strategy for the whole of IAMP is submitted and approved in writing with the Local Planning Authority in liaison with Highways England. The Public Transport Strategy shall

demonstrate that there is sufficient provision to ensure adequate modal choice for the whole of IAMP and how the IAMP One first phase fits with the overall approach.

SCC Highways Response - Noted. The Public Transport Strategy needs to be developed and principles agreed. A suitably worded condition should be included as part of the outline application.

South Tyneside Council Consultation Response

In a letter dated 14th February 2018, it is noted that the IAMP ONE development is supported. However, a request is made for further discussion on public transport improvements to accommodate travel to and from South Tyneside to reduce reliance on car borne trips.

Also raised is a need to understand the operation of the Downhill Lane junction with the A19 and requirements for traffic signal timings.

The last issue raised is to request information on the future operation of Follingsby Lane.

SCC Highways Response – The need to provide wider public transport improvements is recognised and supported. The most appropriate solution is for the local authorities of Sunderland, South Tyneside and Gateshead to work together with Nexus and bus operators to deliver accessibility and connectivity through a Public Transport Strategy for the full IAMP development.

For IAMP ONE, the operation of the A19 Downhill Lane junction will require the completion of the A1290 road widening and the implementation of an Highway Operational Management Plan prior to occupation of the first unit. Any significant increase in traffic over and above IAMP ONE will need to be addressed by the Highways England Major Project for the Downhill Lane junction.

In regard to Follingsby Lane, east –west traffic movements will be maintained via Follingsby Lane and Downhill Lane West. The section of Follingsby Lane connecting to the A1290 is proposed to be subject to a prohibition of certain motor vehicles. Use as a public transport link is to be explored through the emerging Public Transport Strategy.

Nexus Consultation Response

In a response dated 8th March 2018, Nexus acknowledges that IAMP ONE can be served by existing bus stops, and welcomes the bus stop improvements to be delivered.

Nexus have stated that they are happy to discuss proposals with the applicant to assist with short term public transport improvements. In the longer term, Nexus have suggested that an IAMP Public Transport Delivery Group be established with the three local authorities, bus operators and the proposed IAMP Travel Plan Coordinator.

SCC Highway Response – It is noted that the IAMP ONE development is supported, and the intent to work with parties to deliver a wider package of sustainable and public transport measures.

For IAMP ONE, the applicant will be advised to coordinate the bus stop improvement works with the Nexus Bus Infrastructure team. The need for an IAMP Public Transport Delivery Group is

supported and arrangements have already been made to set this up with representatives from each organisation.

Nexus have proposed a suitably worded condition which could be imposed should members be minded to grant consent.

Response to Highway Related Objections

The British Horse Society Response

In a letter dated 9th February 2018, the response supports information provided in the planning statement in relation to improving and providing facilities for pedestrians, cyclists and horse riders. However, the letter raises a number of objections about the Highways England major scheme for Downhill Lane junction, concerns about the new spine road severing Follingsby Lane, and the construction traffic access from Follingsby Lane.

SCC Highway Response – The concerns raised are noted but the following should be taken into consideration. The Highways England major scheme for A19 Downhill Lane junction will be subject to a separate Development Consent Order and is not part of the IAMP ONE planning application. However, the Highways England scheme is likely to include proposals for a new controlled crossing point on the A1290 near the junction with Follingsby Lane which will allow a safe crossing point for pedestrians, cyclists and equestrian users.

The new spine road does sever a short section of Follingsby Lane, however, it is agreed that a safe crossing point will be required to address the needs of all highway users. It should be noted that there is an intention to prohibit certain motor vehicles from using a section of Folingsby Lane between the A1290 and near to Hylton Bridge. This will reduce the volume of road traffic and will be of benefit to non-motorised users in terms of safety and use of this route.

It is agreed that a detailed Construction Management Plan will be required to ensure that construction site traffic is managed to ensure the safety of all highway users. This is a requirement of both the Local Authority and Highways England and will need to be conditioned.

Barton Wilmore

In a letter dated 9th February 2018, sent on behalf of the Church Commissioners of England. This letter sets out an initial objection to the proposed development. The main highway issue raised being the investment in highway infrastructure needed for the wider IAMP development.

SCC Highway Response – The highway infrastructure improvements needed to serve the full IAMP development are set out within policy T1 of the IAMP Area Action Plan. These include upgrading of the A1290, a new vehicular bridge over the A19, a new bridge over the River Don and new distributor roads within IAMP. This infrastructure will also integrate with the Highways England schemes for A19 Testos and A19 Downhill Lane. The applicant has provided evidence to demonstrate that IAMP ONE can be progressed with widening a section of the A1290 and the implementation of an Highway Operational Management Plan. The infrastructure requirements set out in policy will be required to come forward as part of the IAMP Development Consent Order.

Hedley Planning Services

In a letter dated 12th February 2018, sent on behalf of the Town End Farm Partnership. A number of observations have been made under the heading of 'Highways Safety and Delivery' as part of an objection to the proposed development. Observations raised include the methodology used to forecast development generated vehicular trips, the use of traffic baseline data from 2015, the future design year and phasing of the wider IAMP, the methodology used to forecast background traffic growth, junction modelling identifying intersections operating above capacity, traffic flows generated at the A19/A1290 Downhill Lane junction during peak demand, and the proposed mitigation on the A1290.

A subsequent letter from Hedley Planning Services letter dated 5th April 2018 goes into more detail with regard to the above issues.

SCC Highway Response –

In terms of the forecasting of development trips, the methodology adopted for IAMP ONE involved the agreement of a site specific trip rate based on survey data from a known Nissan supplier. The approach is broadly similar to trip generation methodology used for the Land North of Nissan application (planning reference 16/01341/HE4), and therefore considered acceptable. The approach to the trip distribution methodology is similar to that adopted for the Area Action Plan. The approach to trip generation and distribution was agreed as part of pre-application discussions prior to the planning application submission.

In terms of the use of traffic baseline data from 2015, the traffic data is still considered appropriate for this Transport Assessment with committed development traffic flows and traffic growth applied to identify appropriate highway mitigation measures. The traffic surveys were conducted in March with the agreement of the Local Highway Authority, with manual counts undertaken in advance of the week before the school Easter holiday break and is considered a representative period.

The Transport Assessment submitted by the applicant has considered a future design year of plus 10 years (2028) for traffic growth with this application and this is considered appropriate in terms of assessing impact on the local road network for the IAMP ONE development. This includes committed development relating to remaining plots and land uses within both Turbine Business Park and Hillthorn Farm (Low Carbon Enterprise Zone). As part of any future transport assessment work for the Development Consent Order relating to the adopted IAMP Area Action Plan; the Local Highway Authority will be recommending that new traffic surveys be commissioned.

In terms of the nine existing junctions assessed, the modelling work undertaken identifies capacity issues at two key junctions. The first is the A19/A184 Testos junction with additional queuing demand identified. This junction currently operates under traffic signals with MOVA which allows demand based flows to address queue lengths. This queuing demand is not considered to be a severe impact in terms of road safety. However, these capacity issues are to be addressed through a major project to be delivered by Highways England to upgrade this junction. The second is the A19 Downhill Lane junction, and additional queuing demand is identified on A19 slip roads which has a severe impact in terms of road safety. However, this is proposed to be mitigated by the part widening on the A1290 to provide two southbound lanes and

ensure no additional queuing back onto the A19. Subject to a completed detailed design, this proposed mitigation measure is considered to be acceptable.

Given that the IAMP ONE development will create a severe impact at the A19 Downhill Lane junction, it is essential that the A1290 widening works be completed prior to the occupation of any unit. The remaining seven junctions all continue to operate within capacity based on peak hour demand; however any impact will need to be controlled through the implementation of an Highway Operational Management Plan which offsets Nissan shift change by one hour. Subject to the imposing of conditions, the proposed mitigation measures are considered to be appropriate.

Summary Conclusion on Transport and Accessibility

The proposed priority junction arrangements and a one hour offset will enable the local road network to accommodate the critical periods of traffic demand, and allows for alternating peak demand periods. Key to this will be the control of shift pattern arrangements through the Highway Operational Management Plan.

The transport evidence and associated documents submitted with this application addresses the main issues on traffic generation. However, a number of conditions will be required to ensure that there will be no severe impact on the local and strategic road network in terms of congestion or road safety. This is in accordance with the current adopted UDP for Sunderland and site specific policies S1,T1, T2,T3 and T4 of the adopted Area Action Plan and the aims and objectives set out in the National Planning Policy Framework.

6 Biodiversity and Ecology

Chapter K of the Environmental Statement covers Ecology and Biodiversity was submitted as part of the planning application, after a review of the statement the Local Planning Authority requested clarification and additional information to support the IAMP One application. The applicant agent submitted a letter on the 28th February 2018 to clarify several of the issues raised, this has resulted in an addendum to Chapter K of the Environmental Statement being submitted and a formal consultation exercise being undertaken for a period of 30 days. The re-consultation exercise has taken place by way of Press, Site Notice and formal neighbour/objector consultation.

The planning application includes 110 hectares of adjacent land which will be used to accommodate some of the environmental mitigation required for biodiversity loss within the site. This area, known as the Ecological and Landscape Mitigation Area (ELMA), remains in the Green Belt.

The designation of the ELMA is intended to provide a focus for implementing any mitigation and/or compensation for the impacts of the IAMP development on the area's habitats, species and landscape. The AAP notes that the precise area within the ELMA that will be needed for mitigation and/or compensation will be proportionate and (together with the specific location of that area) will be determined through detailed environmental assessment supporting an application for consent. The AAP advises that the extent of the ELMA:

- Allows for flexibility in locating mitigation within it;
- Is likely to allow for future mitigation of both the employment areas and

- Therefore demonstrates that there is sufficient land adjacent to the IAMP with the potential to deliver the 'worst case' amount of ecological mitigation necessary for the IAMP, which in turn supports the deliverability of the IAMP AAP.

AAP Policy EN2 provides guidance on the need to protect and enhance biodiversity. It explains that ecological mitigation measures must be designed in conjunction with landscape and drainage specialists to maximise the ecological value of landscape planting and drainage features. Proposals must include an appropriate long-term Management and Maintenance Plan that will ensure long-term ecological value is maintained.

The IAMP ONE Site will deliver a proportion of the ELMA (a total of 43.6 hectares, including 4.9ha within the planning application boundary) to satisfy Policy EN2 of the AAP. 4.9ha of land have been included in the planning application boundary because these works include engineering operations to create the attenuation basins; whilst the works within the remaining 38.7ha area consist of land management works or the sowing of grasses and planting of hedgerows / trees which do not require planning permission.

The wider 38.7ha of the ELMA land which lies outside the planning application boundary is all within the control of Sunderland City Council and can therefore be brought forward at an appropriate time for mitigation. The delivery of these works can be secured through a planning condition requiring the submission and approval of a Habitat Management Plan. These works will be delivered as part of the contractual agreement between Henry Boot Developments Ltd and IAMP LLP.

The proposals include the following:

- A series of scrapes are proposed as part of the flood compensation measures, but which will also benefit farmland birds and enhance the site for wintering birds. Scrapes are shallow depressions with gently sloping edges, which seasonally hold water. The scrapes and ponds also create connectivity for amphibians and the rough grassland makes provision for barn owl foraging habitat.

- Over 7 ha of on-site native landscaping for biodiversity benefit, including species-rich hedgerows;

- 1500 linear metres of newly created species-rich hedgerow on-site and 3400 linear metres (3.4 linear km) of either created, managed or enhanced hedgerow;

- Over 19 ha of skylark plot habitat, at 2 plots per ha - this is an umbrella species with the largest land requirements;

- Over 9 ha of conservation grazing pasture;

- 2.5 ha of marshy grassland habitat, designed for wading birds, riparian mammals and invertebrates. Wild bird seed crops will be used in the first one to three years to lower nutrients for grassland reversion;

- 2 ha of arable field margins and 2 ha of set aside tussocky grassland, which provides potential barn owl foraging habitat; and

- 1.4 ha of newly created or extended woodland, 0.7 ha of conservation headland and approximately 1 ha of scrub.

- 4.40 In addition, over 2.5 ha of aquatic habitat will be provided within the green corridor running between the industrial units.

The Council Ecologist requested the additional information below to ensure that the development achieves the policies as set out in the Adopted Area Action Plan and to ensure that the proposed development does not cause any significant adverse impact to the area.

Local Planning Authority request for clarification

Further clarification regarding dates of survey work is required in relation to the IAMP one site.

Applicant's response to request

Throughout the ecology and biodiversity chapter, specific reference is made to a suite of baseline assessments undertaken by White Young and Green (WYG; 2015). This report is provided as Appendix K1 as part of the Environmental Statement.

The study area for this work is consistently referred to as the 'broader IAMP survey area', as defined by WYG (2015). Furthermore, a selection of unpublished field notes and draft reports concerning the broader IAMP survey area, produced by Arup in 2016 and 2017, were made available to Golder. These surveys comprised of breeding bird assessment, barn owl and bat baseline results. These are referred to as the 'Arup Study' within the ecology and biodiversity chapter. As scoped and agreed with the Council, Golder undertook an Extended Phase 1 Habitat Survey on 9 November 2017. As described within the ecology and biodiversity chapter this involved site survey to map all areas of habitat on and up to 50 m from the IAMP ONE Site boundary (where access allowed). The results of this work were commensurate with baseline habitat results produced by WYG (2015) and the Arup Study.

Local Planning Authority request for clarification

There are a number of discrepancies within the ecology chapter of the Environmental Statement especially regarding the classification of hedgerows. The written text infers that the hedgerows are species poor and defunct but the phase 1 habitat plan K2 shows approximately two thirds of them as native species- rich hedges and trees. Hedgerows have not been included in the table K6 that summarises baseline site habitats. Section K4.2 within chapter K acknowledges the presence of species-rich and species-poor hedgerows within the IAMP ONE Site. The baseline status of hedgerows is considered distinctly from other baseline habitats (Table K6) and is specifically dealt with in Table K1 as part of the impact assessment process.

Applicant's response to request

Section K1.1.1 specifically addresses species-richness and hedgerow loss. It is stated that 'the IAMP ONE Site contains 2,906 linear metres of species-rich hedgerow, 1,714 linear metres of species-poor hedgerow and approximately 2,000 linear metres of dry ditch. In terms of hedgerow impacts (summarised in Table K9), it is assumed that 639 linear metres of species-poor hedgerow will be retained on-site, whilst 1,075 linear metres will be lost'.

Table K1: Hedgerow Construction Impacts

Habitat	Retained on-site (linear metres)	Permanently Lost (linear metres)
Species-Poor Hedgerow	639	1,075
Species-Rich Hedgerow	1,868	1,038
Species-Poor Defunct Hedgerow	644	0
Total	**3,151**	**2,113**

Local Planning Authority request for clarification

There is a need for a scaled plan to show which hedgerows will be retained as well as those to be created to fully understand the impact of the scheme on this habitat and the species associated it with them.

Applicant response to request

A scale plan has been produced and appended which confirms the extent of hedgerow loss and retention on the IAMP ONE site. Offsite hedgerow creation is shown on Drawing K4. Hedgerow creation on Site is committed as part of the submission, and 1,500m of species-rich planting will occur. Overall, a net gain of 500m of species-rich native hedgerow will be delivered by the IAMP ONE project.

Local Planning Authority request for clarification

A phase 1 habitat survey 2017 was undertaken on the planning application site but no survey seems to have taken place on the offsetting area therefore unable to understand the true ecological value of this area prior to its use as biodiversity offsetting.

Applicant response to request

The existing species and habitats within the offset are understood owing to the WYG (2015) and Arup field studies and assessment in this area. This data is considered valid and robust for the purposes of defining the suitability of the offsetting area to mitigate the IAMP ONE development. Furthermore, the species data for the offset area by WYG confirms that species numbers can be increased without unduly affecting carrying capacity. In essence, this means that species such as skylark can benefit from future favourable conservation management to increase their breeding and over wintering populations in these areas via the provision of an increase in nesting and foraging habitat. This can be secured and managed appropriately by the Council via condition. Ecological carrying capacity of species is only exhausted when the availability of nesting sites or forage is limited when considering a species such as skylark. The scale and proposed favourable land management of the offset area ensures that species population can be sustainably increased to afford a net gain for biodiversity.

Local Planning Authority request for clarification

The survey work for the Iamp one site seems to take into account survey work for the whole area while useful to know this information it is unclear of the direct and indirect effects of the scheme upon species. Further detail is required to understand effects.

Applicants response to request

The ecological impact assessment has been undertaken in accordance with the ecological baseline available for the site. This included data from the IAMP ONE site and the broader area. This breadth of data has enabled a robust assessment to be undertaken. The quantitative habitat loss and gain and eventual mitigation strategy were developed in accordance with the spatial effects considered likely to be afforded by the project (refer to Chapter K in the ES and the impact assessment methodology and results sections, which are based upon CIEEM 2016 guidelines).

Local Planning Authority request for clarification

In relation to bats it is unclear if there are many natural features suitable for roosting and whether they are to be retained and/or lost as part of the development.

Applicant's response to request

Section K5.2.4 of the Ecology and Biodiversity chapter reveals that common, soprano and Nathusius' pipistrelle, Myotis species, noctule and brown long-eared bat use the IAMP ONE Site for foraging and commuting purposes. No buildings will be affected by project proposals. No bats have been recorded during emergence surveys undertaken within the site as documented by WYG (2015).Trees that will be lost in accordance with the project are classified as having either negligible or low bat roosting potential and emergence surveys provided negative results. In accordance with good practice (Collins, 20161) this means that further assessment is not required.

Section K5.3.5 of the Ecology and Biodiversity chapter objectively acknowledged 'operation effects afforded to bats may occur from habitat severance afforded by light spill. In the absence of design mitigation which assumes that light spill from IAMP ONE will not illuminate the Offset, impacts associated with increased light levels would occur on a daily basis throughout the year. Adverse impacts aligned with operation landscape management practices are likely to be continuous throughout the life of IAMP ONE. Given the relatively close proximity of similar industrial and manufacturing premises, the magnitude of operation effects is considered to be minor afforded to a moderate sensitivity feature. As such, a minor adverse significance of operation effect is predicted'.The provision of on-site and off-site enhancements as defined including the transition from monoculture arable habitats toward the provision of 2.5 ha of aquatic habitat (optimal foraging habitat for species such as the Daubenton's which feeds over water), 7 ha of on-site native landscaping for biodiversity benefit, including species-rich hedgerows, 1,500 linear metres of newly created species-rich hedgerow on-site and 3,400 linear metres (3.4 linear km) of either created, managed or enhanced hedgerow within the Offset will clearly benefit this species group.

Local Planning Authority request for clarification

Further analysis around barn owl is required as the WYG report states that West Moor Farm is a potential nesting site, temporary roost site and an active roost site. The farm buildings are immediately adjacent to the development site.

Applicant's response to request

Buildings at West Moor Farm will not be affected by the IAMP ONE development proposals. Figure 4.4.1 (WYG, 2015) indicates that no barn owl foraging habitat would be adversely affected by the IAMP ONE proposals. Habitat creation prescribed within the offsetting area would benefit this species in the medium to long term.

Local Planning Authority request for clarification

Elliscope farm at the time of the WYG surveys and the Arup surveys confirmed that barn owl were nesting at Elliscope Farm which is 350m from IAMP one. Further information is required regarding the interaction between these farm complexes for barn owl and the impacts of construction and operation on the viability of the nest sites.

Applicant's response to request

Buildings at Elliscope Farm will not be affected by development proposals. Figure 4.4.1 (WYG, 2015) indicates that no barn owl foraging habitat would be adversely affected by IAMP ONE proposals. Habitat creation prescribed within the offsetting area would benefit this species in the medium to long term. Connectivity across the offsetting area would be increased over the medium to long term.

Local Planning Authority request for clarification

The development red line to the north west of the site does abut the River Don therefore further understanding of the presence of the species within the River Don at this point and potential effects is required. Paragraph K5.2.1 states that the attenuation features do not infringe on the riparian corridor however one of the features is approximately 10m from the river's bankside and therefore further clarification is required regarding understanding the relationship between the function of these features and the river itself.

Applicant's response to request

A distance of 10 m as a riparian buffer is considered to be reasonably substantial. Relevant guidance published by the Scottish Environment Protection Agency (SEPA2) indicates that a 2 m buffer is the minimum provision that should be considered. The prescribed 10 m riparian buffer is further validated when considering that the buffer extends to what will become optimal aquatic and transitional terrestrial habitat which has been specifically designed to benefit riparian mammals that were studied by WYG (2015). The BCEMP will contain method statements specifically relating to habitat creation and earthworks in this area. This may include the provision of silt fencing during construction. All methods will be discussed and agreed with SCC's ecologist.

Local Planning Authority request for clarification

Within the planning statement para 6.63 river restoration works are mentioned but not referenced in the ES Ecology Chapter, could the LPA have more information regarding this element of work.

Applicant's response to request

River restoration does not form part of the IAMP ONE development proposals. Discussions regarding the potential for river restoration will be considered for IAMP TWO. However, such proposals would need to be agreed in detail with all relevant parties, including the Environment Agency, and set out in detail for IAMP TWO.

Local Planning Authority request for clarification

In terms of the conclusions regarding effect on species these sections would benefit from being expanded especially in relation to bats, water vole, otter, barn owl and birds.

Applicant's response to request.

With regard to the specific species mentioned, the following text is provided as described within Chapter K of the IAMP ONE Environmental Statement:

Bats - The ecological impact assessment process concluded that 'Construction operations are likely to afford a moderate magnitude effect to a feature of moderate sensitivity. As such, a minor adverse significance of effect is predicted.' Effects that are substantial or substantial/moderate are deemed to be significant for the purposes of this assessment and in planning terms. As such, this is not considered to be a significant result. Furthermore, the benefits of the prescribed biodiversity offset will result in a net gain for this species group;

Water Vole and Otter - No habitat for otter or water vole is available within the IAMP ONE Site. Water vole are recorded to the north of the IAMP ONE Site within the River Don and tributary. The WYG (2015) study did not find evidence of otter at this location (refer Figure 4.3.3) The closest potential effect during construction to the River Don and tributary would be the construction of the flood plain attenuation feature within the Offset in the northwest area of the IAMP ONE Site (refer to Drawing K4). However, the flood plain attenuation feature does not infringe the riparian corridor, it is buffered by 10 m and these species are likely to be tolerant of minor construction noise during normal working hours. The benefit that these species will gain from the delivery of the biodiversity offset and habitat creation, specifically the wetland attenuation area, is in no doubt;

Barn Owl – Barn Owl will not be directly affected by IAMP ONE proposals. Figure 4.4.1 (WYG, 2015) indicates that no barn owl foraging habitat would be adversely affected by IAMP ONE proposals. Benefits to this species including the creation of optimal foraging habitat will enhance the local setting for this species; and

Birds – No schedule 1 bird species were recorded during breeding bird surveys at the IAMP ONE site. The reduction of available habitat during the breeding season of 2018 will cause a moderate magnitude effect to a feature of local value. However, over 19 ha of skylark plot habitat will be created within the offset. The Delivery of the BCEMP, HMP and Offset results in a minor beneficial effect over the medium and long term. The enhancement of the offset area through appropriate conservation management as described within an HMP will ensure that species such as sky lark will increase in density in these locations. These can all be secured via condition as part of any approval for IAMP ONE.

Local Planning Authority request for clarification

Further clarity is required regarding the biodiversity offset metric used to calculate the necessary area of land required to mitigate for the impacts of the development.

Applicant's response to request

The habitat compensation (offset) is focused on the same type of ecological features as those affected and equivalent levels of ecological functionality has been sought. The offset area is similar in terms of ecological features and ecological functions that have been lost or damaged,

and with appropriate management has the ability to reproduce the functions and conditions of those ecological features affected. The compensation is provided as close as possible to the location where effects have occurred and benefit the same habitats and species as those affected in accordance with CIEEM guidelines (20163).

Specifically, when considering the scale of the offset, the IAMP ONE built form will amount to a total of 15.5 ha of buildings plus native landscaping and water attenuation features. The offset area will amount to 43.6 ha, this is a scaling up in the order of 2.8 times. Even considering the area of the IAMP ONE site in its entirety (red line planning boundary) ca. 61 ha, the offset is proportionate and reasoned as exemplified in the DEFRA Technical Paper: The metric for the biodiversity offsetting pilot in England, of which paragraph 444 states that 'discussions with stakeholders support the view that fraction multipliers are acceptable in the English situation, and that we should not enforce a minimum 1:1 ratio'. This is particularly pertinent when considering habitats of low distinctiveness such as arable habitat. Fraction multipliers described within DEFRA's technical paper can be applied and indicate a multiplier of 0.71 for the IAMP ONE project. This accords with the ratio as defined in the IAMP Area Action Plan (i.e. 150 ha of development land for IAMP and 110 ha of ELMA, equating to a ratio of 0.73).

Local Planning Authority request for clarification

The suggested habitat creation measures in line with higher stewardship principals seem in keeping with the species affected but this needs to be justified in accordance with the Area Action Plan. The planning statement references work undertaken by WYG regarding mitigation for IAMP one and two but this has not been referenced in the ES chapters or appended to either document.

Applicant's response to request

The Planning Statement refers to how WYG has identified the area available for the ELMA associated with IAMP ONE, the 'Offset' (paragraph 6.59). The Planning Statement also refers to ensuring that the amount of ELMA land required for the offsite mitigation for IAMP ONE is the minimum area necessary to ensure that sufficient land remains to mitigate the effects of IAMP TWO (paragraphs 3.13 and 6.3). The Planning Statement does not discuss any mitigation for IAMP TWO because this mitigation has not yet been established and hence it could not be assessed within the ES.

Local Planning Authority request for clarification

A total of 43.6 ha of biodiversity mitigation is to be created with 4.9 ha within the application site with the remaining outside. The report states that there will be 7.3 ha of soft landscaping with ecological benefits within the site as well as 2.5 ha of aquatic habitat for biodiversity benefit which suggests a total 9.8 ha within the site.

Applicant's response to request

The 4.9 ha referred to above is the area of land within the planning application boundary that sits within the ELMA (IAMP ONE offset). We can confirm that 9.8 ha of habitat creation for biodiversity gain will occur within the red line planning application area (on site) as defined on Drawing K4.

Local Planning Authority request for clarification

The LPA requires a scaled plan detailing the ecological mitigation.

Applicant's response to request

Drawing K4 within the Ecology and Biodiversity Chapter presents a scaled drawing and breakdown of the following habitat creation:

- Over 2.5 ha of aquatic habitat;
- Over 7 ha of on-site native landscaping for biodiversity benefit, including species-rich hedgerows;
- 1,500 linear metres of newly created species-rich hedgerow on-site and 3,400 linear metres (3.4 linear km) of either created, managed or enhanced hedgerow within the Offset;
- Over 19 ha of skylark plot habitat, at 2 plots per ha;
- Over 9 ha of conservation grazing pasture;
- 2.5 ha of marshy grassland habitat, designed for wading birds, riparian mammals and invertebrates;
- 2 ha of arable field margins and 2 ha of set aside tussocky grassland, which provides potential barn owl foraging habitat; and
- 1.4 ha of newly created or extended woodland, 0.7 ha of conservation headland and approximately 1 ha of scrub.

In addition, in advance of the development commencing and parallel with the planning determination process, a Habitat Management Plan (HMP) will be prepared and submitted to Sunderland City Council for approval. The purpose of this document will be to set appropriate aims and objectives for the management of the IAMP ONE Site and Offset, maximising biodiversity benefits for the habitats and species that will be affected by IAMP ONE.

Local Planning Authority request for clarification

The submitted plans for the scrapes within the north west of the site would be beneficial for wildlife; however the plans for onsite aquatic habitat as per Figure K7 do not offer the same degree of wildlife benefits.

Applicant's response to request

These on-site scrape features aim to provide dual function: for biodiversity and for surface water attenuation/compensation. The aquatic habitat will be landscaped for biodiversity value as detailed in Drawings F9.1-F9.4 and F9.7 within Chapter F. Aquatic and terrestrial connectivity will also be reinforced by these features as they span much of the site.

Local Planning Authority request for clarification

The landscaping on site is very basic and minimal coupled with the operational use of the site would question the viability of it functioning to support wildlife.

Applicant's response to request

Landscaping drawings provided within Chapter F (F9.1-F9.4 and F9.7) detail the extent of marginal, wildflower, tree and grassland swards to be created. Terrestrial invertebrates including pollinators
will colonise these areas and provide biodiversity gain.

Local Planning Authority request for clarification

The LPA would recommend that native broadleaved species (appropriate to the area) be planted as part of any landscaping scheme coupled with a minimum 5 years establishment and maintenance period. The application would benefit from a revised landscaping scheme.

Applicant's response to request

Landscaping drawings provided within Chapter F (F9.1-F9.4 and F9.7) detail the extent of marginal, wildflower, tree and grassland swards to be created on site. The proposed establishment and maintenance period will be in excess of 5 years. The species mix will be agreed via condition with Sunderland City Council (e.g. Ecology and Landscape officers).

Local Planning Authority request for clarification

It is suggested that 15ha of land is available from the outset for mitigation; a map and detail of what this will consist of is required to understand if pre and construction impacts are dealt with via this option. Clarification regarding start and finish time for these works is required.

Applicant's response to request

All of the mitigation land that has been designated for the IAMP ONE offset (refer to Drawing K4) is in the control and ownership of Sunderland City Council. Chapter C in the ES and the Planning Statement sets out the proposed construction timeframe (i.e. construction commencing on-site in July/August 2018 and being completed within an envisaged 21 month construction period).
The creation of habitats within the IAMP ONE offset will begin at the outset of the construction programme as soon as planning permission has been granted and will be completed across the whole of the IAMP ONE offset by the end of the construction period. Further detail will be presented within the BCEMP and HMP, which are commitments within the ES and will be conditions of a potential planning consent. Lighting and noise levels (both during construction and operation of IAMP ONE) will be carefully managed to minimise potential disturbance to wildlife. The BCEMP will also include method statements to mitigate effects on breeding birds during construction. These method statements (including pre-construction surveys) will be delivered by an on-site Ecological Clerk of Works.

Local Planning Authority request for clarification

It is understood that agreements have been made with LPA that the remaining mitigation will take place on its land and will start July 2018 and will be complete 2020 would this time table be for all the ecological mitigation work suggested or will there be a phasing plan. This information is required to help understand if it addresses the impacts as they arise through the course of the early construction and operational uses.

Applicant's response to request

As per the information provided above, and as stated in the Planning Statement, the possession and management of the IAMP ONE offset land is aligned with the construction timetable. All land

for the IAMP ONE offset will be made available for biodiversity modification during the summer 2018.

Following the submission of the supporting information, detailed discussions have taken place with the applicant and ecologists. Due to the clarification points above, an addendum to the Environmental Statement has been submitted and appropriate consultation has been carried out in line with the Environmental Impact Assessment Regulation 2017 and the Development Management Procedure Order 2015.

Natural England raised no comments to the revised addendum and requested the Local Authority Ecologist lead on the formal response to the LPA.

The Local Planning Authority requested further clarification on the proposed mitigation from the applicant following the submission of the addendum to the Environmental Statement. The applicant responded with:-

"Section 3.3 and Table K5 in Chapter K of the ES reference habitat quality observations which are suitable to determine the suitability of the offset area and also indicate that the habitat and fauna within the area will not be adversely affected by habitat creation measures prescribed within Chapter K. This assertion is backed up by the assessment undertaken on 9 November 2017 which included areas of habitat that will be used for the offsetting strategy. During this site visit it was noted that habitats within the offsetting area (arable, native hedgerow and scattered scrub) were commensurate with the IAMP ONE habitats and as such; they are ideal for offsetting purposes and will provide an optimal area for providing net biodiversity gain as identified within Chapter K of the ES."

Following consultation with the Councils Ecologist on the addendum to the Environmental Statement confirmation has been received that there are no objections in principle to the proposed development, however, pre commencement and pre construction conditions will be required on both the outline and full element of the scheme to ensure that the proposed development complies with the policies set out in the adopted Area Action Plan S1, S2, EN1, EN2, Del 1 and Del 2

Summary Conclusion on Ecology and Biodiversity

The Local Planning Authority in conjunction with the Council Ecologist have reviewed the submitted information contained within the Phase 1 Extended Survey, Chapter K of the Environmental Statement and addendum to Chapter K a full analysis of the information is covered above which concludes that the proposed development does not have any significant adverse impacts and that the mitigation can be provided both on and offsite to deal with the impact from the proposed development. It is recommenced that suitably worded conditions can be imposed should members be minded to Grant Consent.

The biodiversity benefits that will be realised by the IAMP One planning application accords with the aims and objectives of policy EN2 of the adopted Area Action Plan and the National Planning Policy Framework, which states that we must make sure that " we don't just isolated pockets of wildlife, but rich and connected green spaces for all kind of species to thrive (DCLG 2012)" Effects are consideration to be moderate adverse prior to delivery of mitigation have resulted in outcomes that predict beneficial effects to biodiversity features over the medium and long term.

A section 106 agreement cannot be entered into as the land is within Sunderland City Council ownership and it cannot legally enter into an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) with its self as it would be unenforceable

The points of clarification and the addendum to the Environmental Statement have addressed the concerns raised by the objectors.

The outline and full element of the scheme are considered to comply with the policies set out in the adopted Area Action Plan S1, S2, EN1, EN2, Del 1 and Del 2 and achieve the aims set out in the National Planning Policy Framework document.

7 Landscape and Visual

Chapter F of the Environmental Statement is a comprehensive document that assesses the impact on the development on the landscape and visual impacts. The document covers the following elements to assess the potential impact from the proposed planning application, baseline conditions, potential effects, mitigation, residual effects and a summary and conclusion section within Chapter F.

The Councils Landscape Architect has reviewed the relevant section of the document and has requested some points to be clarified by the applicant.

Council's point of clarification

The Non-Technical Summary contains the following statement in 3.3 Landscape and Visual; The IAMP ONE Site is located within flat, relatively nondescript farmland. The area is not subject to any statutory landscape designations and is considered to be of 'Low' sensitivity; it is a previously disturbed fragmented landscape of comparatively low scenic quality, which is commonplace throughout the wider region.

In national terms it is not considered a "valued landscape" but in local terms it does have positive qualities.

Applicant's response

We have reviewed the LVIA findings and are satisfied that the level of landscape sensitivity applied is consistent with other landscape assessments undertaken across the UK.

The assessment is based on the professional judgment of an experienced Landscape Architect using current best practice guidance.

Council's point of clarification

The table in Chapter F – Landscape and Visual Page 24 attributes the conservation Interest factor as Low /Medium value. Given the diversity of fauna on the site and the presence of wetlands I would have expected a Medium value.

Applicant's response

Taking the LVIA study area as a whole, which contains extensive urban areas and large scale

manufacturing facilities, we consider the overall conservation Interest would be Low /Medium value.

There are no wetlands within the IAMP ONE Site and the more valuable ecological areas lie outside the IAMP ONE Site boundaries.

In any event, Conservation Interest is one of eight factors that collectively define the Landscape Value. Changing 'Low /Medium' to 'Medium' value would not affect the overall landscape value, or the findings of the LVIA.

Council's point of clarification

The name "International Advanced Manufacturing Park" suggests a layout with a higher proportion of planted land and a better setting for the buildings than that proposed. The objective should be to provide a setting more befitting an area of land which has been removed from the greenbelt and is to set the standard for further development in the area.

Applicant's response

Policy S1 (Spatial Strategy for the Comprehensive Development) of the IAMP AAP allocates 150 ha of land for the development of the employment uses and 110 ha of land as an Ecological and Landscape Mitigation Area (ELMA). Policy S1 (3) states that the purpose of the ELMA is "*to provide for mitigation and / or compensation of the ecological and landscape impacts of the IAMP development*". Policy EN1 (C) (Landscape) reiterates that the ELMA "*will provide the focus for the necessary landscape impact mitigation, in addition to landscaping within the allocated employment areas*." It is therefore clear that the name "International Advanced Manufacturing Park" relates to both the employment and the ELMA land and that the development needs to be considered as a whole, with landscape mitigation being provided within both the development areas and on the ELMA land.

A comprehensive landscape strategy has been prepared for IAMP ONE to minimise the impact of the development on the countryside and to provide a defensive Green Belt boundary. The landscaping strategy includes landscaping around the site perimeters, two green corridors running through the site, as well as landscaping within individual plots, around car parking areas and along the central pine road. Policy EN1 (Landscape) of the IAMP AAP advises that development proposals must incorporate a landscape buffer around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt. The IAMP AAP does not specify how wide the landscape buffer needs to be. In accordance with this policy, a landscaped buffer has been provided around the development and will consist of native trees and shrubs. The buffer is considered to be an appropriate and adequate size that will soften the edge of the development and integrate it into the adjacent countryside. At this width, the landscape buffer will also provide a defensible boundary to the Green Belt.

Notwithstanding this, the introduction of a substantial belt of woodland around the site boundaries has not been provided because it would increase the habitats available for predatory species of birds and animals, which would prey on the farmland birds. A key priority is to enhance the habitat for farmland birds rather than create an environment suitable for predatory species.

Policy EN1 also requires that design and landscaping measures are used to reduce the impact of development along the public rights of way. Follingsby Lane is to be closed to non-motorised

vehicles and the existing hedgerows will be augmented with native hedgerow species and hedgerow trees to help reduce the impact of the development in accordance with this policy.
In accordance with Policy EN3 (Green Infrastructure), green linkages are provided along the main roads and landscaped areas along public rights of way, as well as informal open spaces for recreational and wildlife benefits and to provide green links between habitats. A recreational area containing circular walks and seating areas is provided on the ELMA land between the development area and the access road to North Moor Farm. This area is connected to the pedestrian / cycle route that runs through the central open space and along the north western boundary before connecting to Follingsby Lane. Further seating areas are also provided within the central open space to provide recreational opportunities.

In accordance with the draft IAMP Design Code, the proposed planting will provide screening to break up the mass of a building and will help the buildings to blend into the landscape and countryside. The landscaping strategy will also ensure an attractive setting for the development.

Council's point of clarification

The landscape scheme design is compliant with the landscape code set out in the draft Design Code for IAMP.

Specific Comments – Layout Reference is made to the need to mitigate for the adverse visual effects to the close proximity views on the A1290, Follingsby Lane and Downhill Lane and the three residential properties to the north of the site (as specified on page 8). Given that the landscape infrastructure strips to the north and south boundaries have to accommodate clearance for overhead electricity cables and future road widening the area left for tree planting means that the screening effect will be a lot less than, by way of example, that achieved by earlier and wider plantations planted to the south of the A1290.

The proposal would benefit from a widening of theses strips and potentially more off site planting to the north.

Applicant's response

The proposed 'off-site' planting provides a visual barrier to screen the development from the closest residential properties where appropriate. The position and scale of the screen planting has been carefully considered so as not to compromise the primary biodiversity objectives of the ELMA, and is wholly proposed within the land owned by Sunderland City Council. However, there is limited scope for additional planting within the site boundary.

Council's point of clarification

Within the site, the main access spine road and the north west to south east green corridor and access track do not offer much space for mature tree growth, given that they also have to accommodate, to varying degrees, enough space for Suds, footpaths and close mown verges. The end quality of the development becomes more dependent upon what can be achieved on the development plots by way of perimeter fencing and onsite landscape planting.
Again the proposal would benefit from a widening of these strips.

Applicant's response

As described earlier in this response, the proposals are considered to accord with the Policies EN1 and EN3 of the IAMP AAP and it is not considered necessary to widen these strips.
The landscape scheme has been designed to take into account the site/scheme constraints and accords with the IAMP AAP and the draft Design Code for IAMP.

Council's point of clarification

Specific Comments – Species and Varieties

Chapter C Site and Scheme Description C3.7 Landscaping states;

Screen planting, comprising indigenous trees and shrubs, will be established around the perimeter of the IAMP ONE site. The planting will include a percentage of Grey Poplars along with native wood species. Some Scots Pine will also be included to provide year round screening. Grey Poplar is not native and would be unwelcome in a planting mix. The reference to it being native in the Sunderland Landscape Character Assessment is unfortunately incorrect and misleading.

Applicant's response

The inclusion of Grey Poplar in the mix was in direct response to the LCT guidelines produced by Sunderland City Council. Table 4.2 'Guidelines for the Coalfield Lowland Terraces LCT' contained within the City of Sunderland Landscape Character Assessment (September, 2015) states in relation to Industrial Estates and Complexes: *"Seek opportunities to enhance and extend landscaping and integrate new buildings into the landscape. Utilise native species which occur locally, e.g. Grey Poplar".* It is proposed that Populus tremula (Aspen) replaces Grey Poplar in the landscape design proposals.

Council's point of clarification

Using Scots Pine for their year round screening effect compromises the wildlife value that would be achieved by using a native broadleaf mix. It is preferable to use the latter at increased depths to achieve screening.

Applicant's response

The Native Trees/Woodland Mix (T1) proposed includes 10% Scots Pine for year round screening. We do not consider the inclusion of a small amount of pine would compromise the wildlife value of the woodland mix. Within the development parameters there is insufficient external space to increase the depths of native broadleaf mix to increase screening during the winter months, therefore it is proposed that a small percentage of pine is retained. This approach accords with the draft Design Code for IAMP which supports the inclusion of evergreen species to provide year round screening.

Councils point for clarification

There are relatively small areas of species rich meadows.

Applicant's response

Extensive species rich meadows area provided around the compensatory pond areas to the west of the main development area. Also the proposed ponds and swales would be planted with a native wildflower seed mix. There is comparatively little room within the main part of the site to accommodate further wildflower areas. However there would be some opportunity to establish wildflower swards in the verge alongside the A1290, although it is acknowledged that part of this verge would be lost when the A1290 is widened.

We will review the opportunities at the detailed design stage to seek to increase the amount of wildflower swards if practical.

Council's point of clarification

Chapter C Page 10 states that the green corridor will be planted with native trees and shrubs with ground cover species. The proposals show quite a lot of non-native varieties. Whilst recognising the value of some non- native ornamental tree and shrub planting in the green corridor, the proportion looks excessive. Species rich grassland with non-natives could be used to introduce more colour in combination with more native tree and shrub planting? Some evergreen trees would be welcome here.

Applicant's response

Tree Mix T1 and Shrub Mix S1 will be the main components of the 'Green Corridor'. Both are native mixes. It is intended that the ornamental species/ semi-native shrubs (Mixes S2 and S3) would be mainly restricted to the seating areas and to key locations alongside the main pathway. At the detailed design stage we will review the opportunities to increase the ratio of native to non-native planting and will include some evergreen trees as requested.

The use of one variety for the avenue and one variety for the hedging on the central spine, whilst being visually strong, is high risk in terms of resistance to pests and diseases and climate change. More variety will increase resilience, give more seasonal interest and increase the wildlife value for foraging insects. Larger growing varieties than Carpinus betulus 'Fastigiata' and 'Streetwise' would be preferable in order to reduce the visual impact of the development and for their contribution to reducing surface water run-off and providing shelter.

Applicant's response

Generally avenues comprising single species trees or hedges have the greatest visual impact and in this case would create a bold, unifying element through the centre of the IAMP ONE Site. Whilst the species selected, Fastigiate Hornbeam, is a robust avenue tree there is always, (as with most species) the potential that it may become susceptible to pests and diseases or the effects of climate change in the future.

Due to the limited space between the spine road and the adjacent development plots and to minimise future maintenance and ensuring highway safety we would recommend the use of Fastigiate (upright) tree species.

The detailed planting design would be agreed with the LPA as a condition of planning.

Council's point of clarification

Establishment and Management
A five year maintenance period is required to successfully establish the proposed planting. A maintenance programme to achieve this and outlining longer term management requirements should be provided as part of the application and funding arrangements described.

Applicant's response

The planting would be subject to appropriate maintenance and aftercare to ensure its establishment, long-term health and amenity value are maintained. It is envisaged that a suitable landscape management strategy would be conditioned with a planning approval.

Further discussions have taken place between the Local Planning Authority and the applicant in light of the response received above. Due to the hybrid nature of the scheme and submitted plans only being indicative at this stage it is considered the site can accommodate necessary landscaping and if members are minded to Grant Consent that appropriately worded conditions could be imposed on the outline and full elements of the planning application for full details to be submitted in connection with landscaping and future maintenance of the relevant areas.

Summary Conclusion on Landscape

In national planning policy terms, the landscape does not display any demonstrable physical attributes which are " out of the ordinary" and the land is classified as 3b agricultural land. It is therefore not considered to be a valued landscape, although it has been identified as a green gap between Sunderland and Washington.

The key changes to the character of the landscape are listed below:-

- The loss of approximately 54 hectares of Grade 3b agricultural land
- The instruction of industrial development into the semi-rural farmland, which current provides a break between settlements, although the development area is not with in the approved Tyne and Wear Green Belt Boundary.
- The Localised effect on the character patter and scale of the landscape, due primarily to the erection of the large industrials structures in relatively open location.
- Loss of approximately 1,000m of native hedgerow and 0.27 of native woodland, although longer term the proposal would increase the amount of diversity of vegetation compared to existing.

The urbanising effects on the semi-rural landscape would be significant reduced by the dominance of the Nissan plant, located to the immediate South of the planning application site. The size and extent of the existing car plant and associated infrastructure is much greater than the proposed development, thereby increasing the capacity of the landscape and its ability to accommodate the proposed planning application. Within this context, the proposal would not introduce new or alien features to the landscape, beyond those which are defined as the baseline contained and assessed in Chapter F of the Environmental Statement.

Summary conclusion on visual impact

The assessment is accompanied by an extensive suit of visual computer generate images to assist in determining the impact of the proposed planning application. The findings of the assessment are indicated below:-

The development will be primarily visible from the sparsely populated, low lying farmland within 2km of the planning application boundary and from discrete areas of higher ground further afield. In particular it would be visible from Downhill, located east of the planning application and from the upper face of the escarpment south of the River Wear, including the settlement of Offerton, South Hylton and Penshaw Monument.

From the majority of the more distant elevated viewpoints the planning application site would be viewed in conjunction with the Nissan Plant and the surrounding infrastructure.

The overall impact as set out in Chapter F of the Environmental Statement confirms that the overall character and composition of the view at the end of the construction phase, without mitigation would be low to negligible , therefore there is no overall significant adverse impact from the proposed development on the visual amenity of the area.

In terms of the close proximity views, the development would be prominent from the A1290, Follingsby Lane and Downhill Lane and would obstruct existing views across the relatively open farmland. There are also a number of isolated residential properties around the planning application site, from which the proposed industrial units would be visible.

In particular the development would obstruct views and potential affect the settings of three residential properties.

- West Moor Farm
- North Moor Farm
- The White House at Hylton Bridge

It is predicted that prior to mitigation measures being implement the effects on the above properties would be of major significance. However, mitigation measures proposed with the agreement of the residents could achieve a satisfactory form of screening from the proposed planning application site. This would achieve long term screening and could take the form of landscaping and tree planting.

Provided that the mitigations measures are implemented there should be no notable long term visual impacts. If members are minded to grant consent, this could be covered by a suitably worded condition attached to the hybrid planning application.

The outline and full element of the scheme are considered to comply with the policies set out in the adopted Area Action Plan S1, S2, D1, D2, EN1, EN2,EN3, Del 1 and Del 2 and achieve the aims set out in the National Planning Policy Framework document.

8 Flood Risk Assessment and Drainage Strategy

Chapter I of the Environmental Statement – Water Resource and Flood Risk has been updated following detailed discussions with both the Environment Agency and Local Lead Flood Authority. Chapter I addendum has been re-consulted on and no adverse comments have been received to the document.

The site is not located in an area of high risk of flooding but is shown to be located in an area at risk of flooding from a 1 in 100 year +25 climate change flood event from the River Don to the North. It is understood the site will be protected by site wide flood mitigation measures as part of the main infrastructure works to reduce the risk of flooding to the site. The FFL has been set at 36.50mAOD in line with recommendations provided as part of these works.

Surface water and foul water flows will discharge via connection points provided within the site to the main infrastructure and will be restricted to an agreed discharge rate (greenfield flow) with attenuation provided within the site.

Surface water from external areas will be treated at source by means of filter trenches and swales adjacent to kerb lines in line with current Ciria Suds guidance. These will discharge to a surface water attenuation pond within the northern area of the site which will further provide treatment prior to discharge into the main infrastructure drainage system. This along with the offsite Suds ponds will assist in improving the water quality of surface water runoff from the site.

Extensive consultation has been carried out with the Environment Agency and the Local Lead Flood Authority to achieve full compliance with the Adopted Area Action Plan and the National Planning Policy Framework.

Paragraph 103 of the NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. Area Action Plan policies S2, D1,IN2, EN2 and Del1 and UDP policy EN12 stipulates that in assessing proposals for development, the Council, in conjunction with the Environment Agency and other interested parties, will seek to ensure the proposal would not likely impede materially the flow of flood water, or increase flooding elsewhere, or increase the number of people or properties at risk from flooding and not adversely affect the quality or availability of ground or surface water, including rivers and other waters.

In terms of demonstrating and understanding flood risk planning is primarily concerned with the location of receptors (e.g. homes or businesses), taking account of potential sources (e.g. ground, river or sea) and pathways (e.g. rivers, overland flow) that might put those receptors at risk. Flood risk is a combination of the likelihood of flooding and the potential consequences arising. A core aim of flood risk management is to manage flood risk by using a suite of proactive measures which avoid placing receptors further at flood risk.

Planning applications therefore require those who are promoting sites for development to demonstrate whether their scheme is likely to be affected by current and future flooding (e.g. climate change) while satisfactorily demonstrating that their development is safe. This is done via a Flood Risk Assessment (FRA) and Drainage Strategy. The principle aim of a FRA is to determine the acceptable management of flood risk. FRAs should demonstrate that new development is not at risk from flooding from existing drainage systems or potential overland flow routes, and they should demonstrate that proposed development will not worsen the existing situation. This is why managing surface water discharges is recognised as being crucial in managing and reducing flood risk to new and existing development.

The planning submission's FRA confirms that the majority of the site lies within Flood Zone 1 (land having less than 1 in 1000 annual probability of river or sea flooding), however part of the site falls within Flood Zone 2 and Flood Zone 3. Flood Zone 2 relates to land that has between 1 in 100 and 1 in 1000 annual probability of river flooding or land having between 1 in 200 and 1 in 1000 annual probability of sea flooding. Flood Zone 3a relates to land having a 1 in 100 or greater probability of

River flooding, whilst Flood Zone 3b is the functional floodplain – land where water has to flow or be stored in times of flood.

In respect of the application the applicant has undertaken fluvial modelling of the River Don in consultation with the Environment Agency to identify where Flood Zones 2 and 3 are and to consider an additional 25% allowance in river flow for climate change which has been agreed with the Environment Agency. This modelling work has identified a portion of the central area of the site to be at risk pre- development.

Where development land is at flood risk the NPPF requires a Sequential test to be undertaken to ensure no other land is available on which the development can proceed. Through the adopted Area Action Plan and supporting documents two other sites were considered for the location of the IAMP and all the sites were identified as having the same level of existing flood risk.

Further fluvial modelling of the River Don was then requested by the Environment Agency to consider the impact post development on flood risk to and from the site based on the submitted design. This design includes land grading within the floodplain to the west of the development, and quantified areas of compensatory basins (with allowances for a worst case scenario surface water run-off volume from the development) to offset development within the flood plain. This post development modelling shown in the submitted documents and summarised within the Non Technical Note on flood risk shows no flood risk within the development up to the agreed 1in 100 year plus 25%. An 8mm increase in flood risk outside the redline boundary of the site occurs in the 1 in 100 year plus 25% event. This 8mm is inside a modelling tolerance of 10mm. In their statutory response the Environment Agency suggest this 8mm increase does not change the flood hazard rating which is an assessment of flood depth, velocity and impact of debris. The Environment Agency and their review team suggest approval for the proposed design in relation to fluvial modelling

With regards to the proposed development, the proposed dwellings will be classified as 'less vulnerable'. in accordance with Table 3: Flood Risk Vulnerability and Flood Zone Compatibility from the NPPF. In accordance with Flood risk standing advice published by the Environment Agency and even although the proposed land grading to the west will protect the proposed site from the 1 in 100 year plus 25% climate change flood event, the building floor levels will be raised 600mm above the 1 in 100 year plus 25% flood level (of 35.62m) to approximately 36.22m which will also raise them above the 1 in 100 yr. plus 50% climate change level (of 35.8m)

A relatively small proportion of the site discharges surface water to the River Don the rest of the site will discharge toward a culverted watercourse in the south east which ultimately flows under the A19 into Hylton Dene Burn. Detailed hydraulic modelling has been undertaken of the discharges from the whole site, part to the River Don and the majority toward the culverted watercourse. An increase in impermeable area unless managed correctly could increase flow rates offsite. Non Statutory technical guidance for SUDS suggests post development flow rates should meet Greenfield runoff rates or the 1 year Greenfield runoff rates and consider climate change impacts for events up to the 1 in 100 year plus 40% increase in rainfall storm.

Any discharges to the River Don have been modelled to be restricted to mimic Greenfield run-off rates by use of flow controls before they leave the proposed plot boundaries which will be to the east of the high point of graded land away from the flood plain. The impact of surcharged outfalls from the River Don in extreme events has been considered and is considered insignificant. This risk will be required to be designed out as part of the plot development reserved matter submissions.

Due to the known limited capacity of the downstream culverted watercourse to the south east of the site flow rates from the site have been heavily restricted to a 1 year return period rainfall event for all events even for a 1 in 100 year storm event + 40% climate change allowance. This means that the proposed site will discharge a lower flow rate of water into the offsite drainage network in severe rainfall events than what would discharge from the arable land. The volume of additional water will be retained in drainage features on site that have been sized based on this detailed modelling not to flood in the 1 in 100 yr +40% scenario. A blockage scenario of the critical point in the drainage network before discharge from the site has been considered. This has identified that such a scenario would lead to contained rising water levels in open water on the site which would alert site occupants of any risk before an incident would occur. In addition Flood flow routes have been identified should any of the drainage network be exceeded to design out risk.

The drainage design for the site follows Sunderland City Council Local Flood Risk Management Strategy and national best practise guidance (CIRIA c753) in providing for sustainable drainage for the site infrastructure and plot 3 development. The drainage network includes swales and a series of ponds and requires all plot developers to provide source control to ensure any polluting run-off is mitigated.

Following the simple pollution indices method in CIRIA c753 it has been conservatively assumed that all sites has the highest polluting load. Therefore all infrastructure drainage and plot 3 has been provided with water quality treatment detailing that confirms the drainage they provide will meet the requirement of CIRIA c753 with regard to residence time and volume of treatment. All futures plots will be required by condition to meet the same standard.

Maintenance plans and schedules have been provided for each drainage asset and a requirement of the approval will be a submission of an annual report to confirm what maintenance has been undertaken and any remedial actions taken.

The foul drainage from each plot will be directed to Northumbrian Water sewer. Northumbrian Water has accepted the foul flows from the site and has proposed a conditions should member's be minded to grant consent.

The Local Lead Flood Authority and the Environment have both confirmed that the application is acceptable with conditions for detailing of some construction drawings and informative requirements for submission of watercourse consents for any works to existing drainage ditches.

In summary the significance of the effect on the neighbouring land from change associated with loss of flood storage is considered to be minor adverse. The significance of effect on the land ad IAMP One site from changes associated with loss of flood storage and changes to flood risk from the development itself are minor adverse and minor beneficial. The significance of effects on the surface water in the tributary/River Don watercourses resulting from the different potential sources of change predicted to range from minor adverse to netural. The significance of effects on the drains receiving site discharge resulting from the different potential sources of change is predicted to be range from minor adverse and minor beneficial.

Responses to objections stated from Town End Farm Partnership representation

Page 5 number 1

The Flood Risk and Drainage Strategy EIA identified that 5% of the site is within flood zone 3 and,25% in flood zone 2. Impacts of fluvial flooding on wildlife have not been considered but could,result in pollution with other parts at high and moderate risk from surface water flooding. It is,proposed that this risk is address by raising floor levels but the risk of car parks flooding with,associated pollution impacts is not addressed. The EIA states that there is a risk of urban,contaminates in surface water runoff flowing into receiving water courses with the IAMP site,identified as having a 'high' pollution hazard with EA and LLFA (pg. 34 of Systra EIA).

Response

All surface water discharges from the scheme, including car parking areas have to provide mitigation to the highest standards and deal with run-off to the 1 in 100 yr +40% event. It is correct to say there is a risk of contaminants being discharged from site which is why integral mitigation is provided to industry best practise standards on all plots and infrastructure and evidenced in the submitted documents.

Page 6 number 1 – services

A development of this size will require considerable upgrading of existing services e.g. power, gas,,water mains, surface water discharge points etc. probably resulting in offsite and boundary impacts,e.g. hedgerow loss, work within existing watercourses. No description of these works is provided,within the EIA and no assessment of their impact on ecology.

Response

Assessment of surface water discharge points have been made. S50 works to be done in the highway for surface water drainage other water supply works will be through the proposed highways. Work within existing watercourses within the land will be required through the land drainage act to obtain a watercourse consent which includes consideration of a water framework directive assessment before works can take place.

Page 7 number 1b – Plot 3

The SUDS provision is not consistent with the surface water maintenance plan/strategy shown on Systra surface water maintenance plan for IAMP 1.

Response

The SUDS provision and maintenance provision is consistent with the wider site strategy in terms of flow rates and water quality treatment provision.

Page 7 number 3 – Plot 3

Will surface water from this development be discharged to the River Don. If so what would the,impacts of this be on the aquatic and terrestrial ecology of the River Don – the EIA is currently,deficient with respect to impacts on aquatic ecology. There is also the risk of impacts on water vole,,otter and kingfisher – a legally protected species.

Response

No.

Page 8 number 1

The site area within Flood Zone 3, is not being developed upon and additional compensatory, storage is proposed to be provided as agreed with the EA. However, evidence of this agreement, including attenuation volumes and discharge restrictions is not provided within the report.

Response

The Environment Agency have undertaken a 3rd party review of the fluvial modelling for the application and have suggested it be approved hydraulically. As a statutory consultee the Environment Agency have submitted their response for conditional approval.

Page 8 number 2

The volume of how flood compensation is catered for is unknown. In addition, during heavy storm,events, the flood compensation areas also act as attenuation facilities for IAMP One but there is no,evidence of an integrated model illustrated the flooding effects of River Don and IAMP One – as,such the flood risk appears unknown. This should be clearly demonstrated to ensure flood risk is,suitably mitigated.

Response

The volume of flood compensation is detailed within the non-technical summary appended to the FRA/Drainage assessment.

Page 8 number 3

There is evidence of discussing the flood levels and floor levels of the proposed site with the EA, however there is no mention of the bund set at the 1 in 100 year plus 50% climate change as, shown on Drawing no. IAMP_ONESYSHDGZA1DRD05014S0P04.Evidence is required to show, that sufficient compensatory storage has been provided and that flood risk has not been increased, off site.

Response

It was agreed with the environment agency to consider extreme events up to the 1 in 100 +25% . The impacts of the provision of a bund post development are shown within the non technical flood note.

Page 8 number 4

The northern catchment area of the site discharges into the River Don via swale and ponds, providing attenuation. River levels have not been provided for storm events below the 1 in 100,year frequency, therefore the effectiveness of such attenuation cannot be assessed as the, likelihood of the storage being submerged during heavy rainfall events is unknown.

Response

It has been demonstrated by the submitted documents that the in the worst case scenario the compensatory storage and attenuation provided does not increase flood risk. The drainage design provide will better this at lower return period events with or without surcharge.

Page 8 number 5

The layout drawings are in accordance with 'NonStatutory,Technical Standards for Sustainable,Drainage' LASOO, 2016. However, quantities relating to flood compensatory and attenuation,require clarification (refer to Flood Risk and Drainage Strategy Review notes above.

Response

The volume of flood compensation is detailed within the non-technical summary appended to the FRA/Drainage assessment.

Page 8 number 6

The 3rd party evidence requirements are not in accordance with 'NonStatutoryTechnical Standards for Sustainable Drainage' LASOO, 2016. This is particularly important from the EA for the discharge into the River Don.

Response

The Environment Agency has responded to the application as a statutory consultee and is content with fluvial modelling provided. The is an informative requirement for provision of a flood risk activity permit relating to the construction of the connection to the River Don which will be considered post planning approval.

Page 8 number 7

For the surface water drainage connection discharging into the Culvert, evidence from Sunderland. City Council has not been provided. This should be provided for planning submission.

Response

The Lead Local Flood Authority has responded to the application as a statutory consultee and is content with hydraulic modelling to discharge to a culverted watercourse. There will be requirement under the land drainage act for provision of further details before connection to the watercourse. This is can be done using a Section 50 notice under the Highways Act.

Page 8 number 8

For the surface water drainage connection discharging into the River Don, evidence from EA has not been provided. This should be provided for planning submission.

Response

The Environment Agency has responded to the application as a statutory consultee and is content with fluvial modelling provided. The is an informative requirement for provision of a flood risk activity permit relating to the construction of the connection to the River Don which will be considered post planning approval.

The above comments also the concerns raised by Barton Wilmore 2nd letter of objection and clarfy issues raised by both South Tyneside and Gateshead Council.

Summary conclusion on Flood Risk and Drainage

In conclusion, the submitted FRA, Drainage Strategy and associated plans have adequately demonstrated that the detailed and outline elements of the planning submission are acceptable in respect of flood risk and water quality and, subject to the imposition of conditions, the planning submission is considered to be acceptable and in accordance with the requirements of the Adopted Area Action Plan Policies S2,D1, IN2 Del1 and EN2, Paragraph 103 of the NPPF and UDP policy EN12.

Should Members be minded to Grant Consent it is recommended that conditions are imposed in respect of the Environment Agency response and additional conditions proposed from the Local Lead Authority to ensure the development will comply with both National and Local Policies as set out in the paragraph above.

9 Heritage and Archaeology;

Section G of the Environmental statement covers aspects of Heritage and Archaeology, the comprehensive report has analysed the potential impact on Heritage Assets and Archaeology.

The implications of the development in respect of archaeology;

Paragraph 141 of the NPPF advises that LPAs 'should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted'

In keeping with the nature of this paragraph, UDP policy B10 promotes the protection of the character and siting of listed buildings, whilst policies B11, B13, B14, B15 and B16 of the UDP are concerned with safeguarding sites of known or potential archaeological significance. Where such sites are to be developed, applications should be accompanied by a desk based archaeological assessment.

Policies B10, B11, B13, B14, B15 and B16 are all fully compliant with the NPPF.

The County Archaeologist has reviewed the submitted report and a summary of the report and findings is set out below: The County Archaeologist comments are going to concentrate on buried archaeology. The County Archaeologist has not commented on the setting and visual impact on nearby designated heritage assets (such as Hylton Castle which is Scheduled and Hylton Grove Bridge which is grade II listed), this will be assessed by the Council Built Heritage Protection Team.

The County Archaeologist has confirmed the following archaeological work have been undertaken:

- Cultural heritage assessment by Golder Associates
- Air Photo and LiDAR interpretation by Alison Deegan
- Archaeological monitoring of geotechnical trial pits by Archaeological Services Durham University
- Geophysical survey by Archaeological Services Durham University
- Evaluation trenching by Archaeological Services Durham University
- Topographical survey of ridge and furrow earthworks by Archaeological Services Durham University

There are three known archaeological features within the IAMP ONE site:

- The former Pontop and South Shields branch of the Stanhope and Tyne Railway – now built over by the A1290 road
- Decontamination unit for RAF Usworth – all that survives is the concrete base
- The site of a barbed wire barricade associated with RAF Usworth – has since been removed

The archaeological monitoring of ten geotechnical test pits revealed no archaeological remains.

Geophysical survey identified ridge and furrow and possible soil filled features.

The geophysical anomalies were investigated through evaluation trial trenching in December 2017. No significant archaeological remains were found. The County Archaeologist has reviewed all the submitted information and has recommended that conditions should be imposed should members be minded to Grant Consent for this hybrid application. Following the reconsultation no further comments have been received, just recommendation to imposed the conditions as set out below.

Archaeological work required:

Archaeological watching brief during the construction of the proposed surface water drain east and south of the A1290 (because this element of the scheme has not been archaeologically evaluated).

Archaeological Watching Brief Condition

No groundworks or development shall commence on the surface water drain, east and south of the A1290, until the developer has appointed an archaeologist to undertake a programme of work set out in a specification provided by the Local Planning Authority. Before development commences the route of the surface water drain shall be topsoil stripped by the appointed archaeologist in order that any archaeological remains can be recorded and where necessary, archaeologically excavated. The appointed archaeologist shall then be present at relevant times

during the undertaking of the developer's groundworks with a programme of visits to be agreed in writing by the Local Planning Authority prior to groundworks commencing.
Reason: The site is located within an area identified as being of potential archaeological interest. The observation is required to ensure that any archaeological remains on the site can be preserved wherever possible and recorded, and , if necessary, emergency salvage undertaken in accordance with paragraph 141 of the NPPF, Draft Core Strategy Policies E4 and E5 and saved Unitary Development Plan Policies B11, B13 and B14.

Archaeological Watching Brief Report Condition

Within six months of the completion of the archaeological work, the report of the results of archaeological work pursuant to condition (Insert condition number) shall be submitted to and approved in writing by the Local Planning Authority.
Reason: The site is located within an area identified as being of potential archaeological interest. The investigation is required to ensure that any archaeological remains on the site can be preserved wherever possible and recorded, to accord with paragraph 141 of the NPPF, Draft Core Strategy Policies E4 and E5 and saved Unitary Development Plan Policies B11, B13 and B14.

The Council Built Heritage team has reviewed the application and requested the applicant to clarify some initial concerns in respect of impact on the wider area.

The applicant has confirmed as per the submitted document, that all heritage assess have been careful considered, from several key viewpoints such as Penshaw Monument and Hylton Castle

Further discussions have taken place with the Councils Built heritage officer and he has confirmed that the analysis and key findings document in Chapter F are considered satisfactory that there is no significant adverse harm on either Penshaw Monument or Hylton Castle.

A total of 28 non-designated assets are recorded within 500m of the IAMP One site, details of which are presented in the cultural heritage gazetteer in Appendix G1 of the Environmental Statement Section G.

There is one listed building within 1km of the site, this known as Hylton Grove Bridge, it is a Grade II Listed Building and located 169m north of the application site.

The assessment has considered potential impact on affected assets potential impact during construction, during operation and decommissioning.

The proposed summary on cultural heritage on IAMP One has concluded that based upon baseline comprehensive data, which used a combination of desk based assessment, archival research, air photo and LiDAR analysis and geophysical surveys. The baseline was then verified by archaeological evaluation.

The majority of the cultural heritage assets are predicted to experience a neutral or minor adverse impact as a result of this planning application. It is predicated, however, that there will be a moderate adverse impact at the designated assets (LB-11) (Hylton Grove Bridge), which will be mitigated through the establishment of screening within the ownership boundary. A potential substantial adverse impact was also identified upon undisclosed archaeological remains that may

exist along the route of the proposed culvert. This will be mitigated through a watching brief as proposed by the County Archaeologist.

Summary Conclusion on Built Heritage Section.

The proposed development is not considered to have any significant adverse impacts on the Built Heritage and there the proposed development is considered to comply with both adopted Unitary Development Plan policies and paragraph 141 of the National Planning Policy Framework.

10 Health Impact Assessment

A comprehensive Health Impact Assessment has been submitted by the applicant. The assessment has been reviewed by the Director of Public Health.

The National Planning Policy Framework advises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It also states that local planning authorities should promote healthy communities through development of local plans and in planning decisions. Planning Practice Guidance states, "*the link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing*" (Ref: ID: 53-002-20140306). PPG also notes that issues for the planning system that could be considered include:

- supporting strong, vibrant and healthy communities and helping to create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital;

- the healthcare infrastructure implications of any relevant proposed local development have been considered;

- opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);

- potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and

- access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.

In July 2017, Sunderland City Council consulted upon an emerging Core Strategy and Development Plan. The draft includes Strategic Policy SP3 Health and well-being.

This Health Impact Assessment should be considered alongside the full planning submission including the Environmental Statement, particularly the air quality, noise, landscape and visual impact and socio-economic chapters and supporting appendices (Chapters D, E, F and M).

Secretary of State's DCO EIA Scoping Opinion

The Secretary of State (SoS) adopted a Scoping Opinion in respect of the content of the Environmental Statement for the proposed IAMP on 27 September 2016. In relation to Population and Human Health, the SoS's advice is summarised as follows:

- The applicant should have regard to the responses received from the relevant consultees regarding health, and in particular to the comments from Public Health England regarding methodological approaches and from the Health and Safety Executive;
- The Health and Safety Executive did not identify any specific health related matters, except in relation to the requirement for appropriate consents if hazardous substances are to be stored on site;
- The detailed methodology for the population and human health assessment should be agreed with the relevant statutory consultees, where possible, and take into account mitigation measures for acute risk;
- The proposed assessment of cumulative effects in a number of determinants on a given receptor is welcomed; and
- Detailed significance criteria should be provided in the ES and that any use of professional judgement is clearly explained

For IAMP ONE it was not considered that there would be any significant environmental effects and therefore the inclusion of chapter assessing the impact upon population and human health was scoped out of the Environmental Statement in agreement with the Local Planning Authority. Relevant comments from the Scoping Opinion have been included in this assessment, albeit it is noted that this does not form part of the Environmental Impact Assessment.

Outcomes from the Health Impact Assessment;-

Changes to the character of the local environment as a result of construction works may have a perceived impact on community safety due to the presence of hoardings, construction activities and access diversions. Such perceptions are unlikely to affect everyone as some people are likely to be reassured by greater activity on the construction site and through increased natural surveillance. Notwithstanding this, the changes to the environment have the potential to modify existing healthy behaviours.

The perception of safety concerns may deter some people to choose active travel options during the construction phase. This could have a negative impact on individuals or groups of individuals who need to be more active as part of managing or preventing cardiovascular or circulatory diseases. However, all populations are encouraged by Public Health England to undertake some regularly activity such as walking. The impact upon those residents living adjacent to the site is likely to be increased predominantly due to proximity and the consequential use of the immediate infrastructure and outlook.

The impacts are likely to take place immediately once site preparation begins. Impacts are likely to be temporary while the construction works are ongoing but should cease once the construction works have been finished and the site completed. The completion of those works in closest proximity to the residential dwellings (identified as part of the priority group) and in the areas most affected by the closure, diversion or in general proximity to footpath and cycle access routes may give rise to slight improvements. However, on balance the phasing of the development is unlikely to give rise to significant improvements.

A Construction Management Plan and a Construction Traffic Management Plan will be prepared for the construction phase of the proposed development. Measures can be included within these plans to reduce the risk of these adverse outcomes. If members are minded to grant consent it is recommended that the conditions should be imposed to ensure the appropriate mitigation measures are imposed.

The proposed development may have a **short-term**, **temporary** and **moderate negative** impact upon the immediately adjacent residents. For the remaining groups and the general population there may be a **short-term**, **temporary**, and **negligible to minor impact,** recognising that it will be those who are immediately adjacent to the construction activity who are likely to be most affected.

Intervention Measures/Recommendations

The construction plans should consider opportunities to include the following:
1 Adopting site security measures to avoid the risk of or perception of anti-social behaviour/crime.

2 Managing construction traffic in order to minimise turning movements that could cause delays on the highway network or conflicts on the highway, pavements and formal and informal cycle routes.

3 Paying particular regard to reducing the effects on pedestrian/cycle delays and potential risks of an increase in accidents.

4 Protecting the availability of existing pedestrian/cycle crossings wherever possible.

5 Providing contact details for a community liaison.

6 Providing regular updates on progress to the community.

The report concludes, the proposed development will have a short-term, temporary, negligible to minor adverse impact on the health of the defined baseline area population and priority groups during construction, predominantly from the impacts presented through the logistical arrangements of the construction phase e.g. the closing of access routes, the change in character, the reduced access to green infrastructure corridors. Construction activities will also generate some noise and air quality effects but the proposals also include effective mitigation measures which will minimise the impacts upon the local area.These can be further enhanced through consideration by the applicant of the recommendations in this report. Construction activities will generate new employment which has the potential for direct and indirect positive health outcomes.

In terms of the operational phase, it is assessed that overall the proposed development will have a long-term, permanent, moderate positive impact on the health of all priority groups and on the general public. This positive health outcome is linked to the provision of the creation of social networks, well-considered access that will encourage physical activity, enhanced green infrastructure corridors and the generation of employment opportunities.

The Director of Public Health has reviewed the document and has responded the Health Impact Assessment is a good and thorough piece of work offering an honest and realist assessment of the likely scope and duration of impacts both positive and negative. Negative impacts are mostly minor and short lived (i.e., limited to the construction phase) whilst the positive impacts of whatever size are for the longer term. Mitigations suggested appear to be appropriate and reasonable. In most cases health or mitigation against health risk have been designed or planned in. Compliance with the stated approaches would be paramount.

I would just want to add one minor issue, if possible. I do not know if it is within the remit of this process, but I would ideally like to have a condition placed on this development that there should be no smoking shelters on this site. I would expect that this would be most relevant in the operational phase. Given our high levels of smoking in the City, this would help to mitigate any issues relating to lung cancer and CVD at the population level.

Consideration has been given to the request; however, this is not something that is under the control of the planning department. The planning department could only reasonable control the physical development of a shelter but could not restrict the use of if not being used for smoking. A proposed condition to restrict no smoking shelters would not meet the legal test of imposing a planning condition and such a condition would not be reasonable and couldn't be enforced by the Local Planning Authority. An advisory note could be placed on the decision notice to make any future developers aware of the Director of Public Heaths request.

The benefit of designing in a community hub and/or liaison function has the potential to mitigate even further than what is described in the report. Good communication and engagement with the local community, alongside messages about the longer term benefits, could help to address the potential reduction in physical activity and active travel. It would also provide a point of contact that we could use to hook in additional targeted support. Early engagement from a range of public health commissioned services and Active Sunderland, and for health protection messages would potentially reduce some of the negative impacts.

No major concerns have bene raised from the Health Impact Assessment, however, it is recommended that a condition be imposed that the mitigation measures proposed in the Health Impact Assessment are adhered to.

The Director of Public Health has suggested that we prepare some targeted support for the surrounding areas during the construction phase as she may wish to consider this from an Area Arrangements perspective; this will be worked out independently from the planning process.

11 Loss of Agricultural Land;

Paragraph 112 of NPPF requires LPAs to take into account the economic and other benefits of the best and most versatile agricultural land and states that *'where significant development of agricultural land is demonstrated to be necessary, LPAs should seek to use areas of poorer quality land in preference to that of a higher quality*'. The 'best and most versatile agricultural land' is defined in the NPPF as land in grade 1, 2 and 3a of the Agricultural Land Classification.

UDP Policy CN8 and draft CSDP Policy E16 (Agricultural Land) also both protect the best and most versatile agricultural land (Grades 1, 2 and 3a), subject to various criteria.

Natural England's Agricultural Land Classification map for the North East Region (ALC001) identifies that the application site constitutes Grade 3 Subgrade 3b (moderate quality). The proposed loss of the agricultural land is therefore considered to be acceptable as it **is not the best** and most versatile agricultural land.

The land contained within IAMP One is classified as 3b and as stated above it is not considered to be the best and most versatile agricultural land, therefore the proposed loss of the land is not considered detrimental and the benefits from the development of IAMP One are considered a significant in the delivery of the National Significant Infrastructure Project. The proposed development on the 3b land is considered acceptable and not in conflict with both National and Local Planning Policy.

12 Amenity;

The cottage at West Moor Farm may remained occupied during the construction and operation , located to the south west of IAMP One, however it is anticipated it will be vacated during the construction. The Landscape and Visual Chapter of the ES identifies that the development would obstruct views from, and would adversely impact on the setting of, three residential properties:

- The cottage to the north of West Moor Farm;
- North Moor Farm, to the northwest of the IAMP ONE Site; and
- The White House, at Hylton Bridge.
-

However, off-site planting is proposed (subject to the agreement of the occupiers) on land owned by Sunderland City Council, could provide effective long-term screening of the proposed development.

The cottage at West Moor Farm is the closest dwelling to the proposed industrial units (being situated 97m away). At this distance the proposed industrial units have no impact on the privacy or the amount of daylight or sunlight reaching the dwelling.

The proposals include the provision of a realigned access to North Moor Farm. Access to the farm will be retained whilst the realignment works take place.

The temporary closure and/or diversion of Public Rights of Way (including part of Downhill Lane) during construction may be necessary in order to deliver key site infrastructure. It is understood, however, that alternative walking and cycle routes will remain available (including Downhill Lane to the north which follows the Great British Heritage Trail and diverts off at Hylton Bridge). It is likely, that any route diversions would be minimal.

Summary conclusion on amenity

Overall, the proposals comply with UDP Policy EN1 (Built Environment), AAP Policy EN4 (Amenity) and draft CSDP Policies S2 (Land Use), E1 (Urban Design), EN15 (Creating and Protecting Views) and EN17 (Quality of Life and Amenity) and as such if members are minded to grant consent a condition can be imposed to ensure boundary screening is provided in discussion with the owners.

13 Ground Conditions / Land Contamination;

Impact of the proposed development on contaminated land.

Section J of the Environmental statement covers aspects of Ground Conditions / Land Contamination, the comprehensive report has analysed the potential impact on Ground Conditions / Land Contamination.

Section 11 : Conserving and Enhancing the Natural Environment of the NPPF states, in part within paragraph 109, that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development form contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. Paragraph 120 is concerned with preventing unacceptable risks from pollution and land instability and highlights that where a site is affected by

contamination or land stability issues the responsibility for securing a safe development rests with the developer and/or landowner.

The impact of the development in respect of ground conditions, including coal mining legacies;

Policy EN14 is relevant to the consideration of this planning application.

Policy EN14 of the adopted UDP states that:

Where development is proposed on land which there is a reason to believe is either:

- Unstable or potentially unstable;
- Contaminated or potentially at risk from migrating contamination;
- Potentially at risk from migrating landfill gas or mine gas;

The Council will require the applicant to carry out adequate investigations to determine the nature of ground conditions below and, if appropriate, adjoining the site, where the degree of instability, contamination, or gas migration would allow development subject to preventative, remedial or precautionary measures within the control of the applicant, planning permission will be granted subject to conditions specifying the measures to be carried out.

This planning application is accompanied by a preliminary Geotechnical and Ground Contamination Desk Top Review on report and additional information has been submitted during the formal consideration of the application.

The constraints report includes the following

- walkover survey on 16/2/2016
- site history based on:
  Ordnance Survey maps supplied in an Envirocheck report (not provided) – east half
  other OS maps for northwest section – source not provided
  geo-referenced historical maps 1895 – National Library of Scotland
  google aerial imagery
- pre-desk study UXO assessment
- geology based on 1:10,560 geology map sheets NZ36SW, NZ35NW
- Coal Authority Mining Report
- Various AECOM reports for Sunderland Enterprise Zone
- Online source Environment Agency, British Geological Survey, Coal Authority, UK Radon Map

The site walkover found the topography to be typically level or gently undulating. Most of the roads and former railway lines are at grade. There was standing water in many of the fields indicating poor drainage. Reeds were growing in the south-eastern corner, suggesting persistent wet conditions.

The site history is based principally on 1:10,560 and 1:10,000 mapping. Without copies of the mapping being provided it is difficult to ascertain which parts of the report are relevant to Phase ONE. For mapping of 1855-62; “A dam and an engine house are mapped at the railway/river crossing”; it is assumed this will be in the southeast corner of the site following a later description for development railway at 1894-1895. A Public House and Smithy are noted at the south-eastern road junction in 1894-95 mapping; which is taken as probably within Phase ONE. Follonsby Colliery and “reservoirs” are located along the eastern boundary in the northeast area of the site (outside of Phase ONE). The smithy is no longer marked by 1951-52. A built up area is mapped

opposite the pub in the south-east corner of the site in 1967-68. [1:2,500 mapping and also air base records provided by Sunderland to the aviation museum show this to be the officer's quarters including air raid shelters and ancillary buildings which formed part of the Usworth Air Force Base.] In 1980, the development in the south-east corner reduced to "Playing field" and "ATC centre" and pub. In 1990/90 mapping the southeast corner includes the North East Aircraft Museum. The nearby former aerodrome has been identified as RAF Usworth from 1916, however the smaller scale maps have not identified this land use.

A preliminary screening of the site by Zetica concluded: "Given that the Site was located in close proximity to RAF Usworth, which was associated with aircraft crashes and bombing raids during WWII, a detailed desk study is recommended to assess and potentially zone the Unexploded Ordnance (UXO) hazard level on the Site."

The drift geology has been identified predominantly as Upper (Pelaw) Clay typically comprising brown blocky, silty clay with pebbles and small cobbles and common lenses and thin beds of sand at surface, with alluvium along the River Don. Underlying the Pelaw clay is the Tyne Wear Complex comprising interbedded laminated silty clays and clayey silts, fine grained sands, stony clays and some gravels and Durham Lower Boulder Clay comprising over-consolidated (generally stiff), sandy clay with abundant pebbles and cobbles and a few boulders.

The Coal Authority identifies a mine shaft to the west of Phase ONE and considers there to be a risk of further unknown mine entries. The site is undermined by known workings in eight coal seams between 190m and 570m depth last worked in 1981. Any ground movement associated with these workings should by now have ceased. The CA advise that "In view of the mining circumstances a prudent developer would seek appropriate technical advice before any works are undertaken." This could refer to just the area around the shaft (off-site) or the whole site given the risk for unknown mine entries. It would be advisable to obtain a new Coal Authority Mining Report for Phase ONE in order to understand any special responsibilities for future development.

The bedrock is composed of Upper and Middle Pennine Coal Measures. Coal measures comprise interbedded layers of Sandstone, Siltstone, Mudstone and Coal. The Top and Bottom Hebburn Fell Coal Seam subcrop in the south-west corner of the site. The Usworth fault, with a down throw of c.10-15m and trending north-east to south-west, crosses the Claxheugh perpendicularly and exits the site in the south-west corner. Various other unnamed geological faults, typically trending north-west to south-east, underlie the site at surface level and at depth in coal seams. These might affect the depth of the Top and Bottom Hebburn Fell Coal beneath Phase ONE. Bedrock in the south east of the site is encountered at as little as 1m depth, however the depth to bedrock seems to be highly variable. The risk of shallow unrecorded mine workings does not appear to have been addressed.

The superficial deposits are generally classified as unproductive strata (non-productive), however the alluvium around river channels is regarded as a (Superficial) Secondary (A) Aquifer. The underlying bedrock is a Secondary (A) Aquifer. There are no groundwater source production zones associated with the site.

Quarrying appears to have been undertaken east of Phase ONE, and the Pelaw Clays have been used historically for brick at Wardley Quarry outside Phase ONE. No known clay quarries appear to underlie Phase ONE. The nature of the relationship between the soggy ground in the southeast corner and underlying bedrock should be investigated.

Ecologists at Arup have confirmed Japanese knotweed and Himalayan Balsam have been identified during ecological surveys. This includes Japanese Knotweed stand(s) just north of the White House in the middle of the wider site. The significance of this to the south west area is not

understood and it would be advisable to consider this risk for Phase ONE.

Potential sources of contamination on the Phase ONE site are as follows;

- Spread of sewage across the site
- Oil pollution incident on the eastern boundary of the site
- Roads and railways across the site
- (unexploded munitions)

Possible sources of made ground and contamination from use of the Site for officers attached to the wartime aerodrome are not discussed.

A preliminary conceptual site model and preliminary risk assessment are not discussed formally although some risks such as mine gas or landfill gas are eliminated due to the lack of evidence for mine gassing (despite the shaft previously having been used for methane drainage), and low thickness of made ground.

Conclusion

The report has a lack of clarity concerning some of the risks due to reduction in the site being considered. The smaller scale OS mapping in particular fails to identify the previously censored military bases infrastructure comprising officer mess. This site should be investigated to identify if structures remain for this, and particular care should be used to identify possible asbestos in buried structures such as air-raid shelters, and also former fuel tank areas.

The Coal Authority Mining Report should be ordered for the Phase ONE area in order to determine any difference in risk.

The risk of shallow unrecorded mine workings should be assessed based on any workable coal seams located with less that 10m of rock head within Phase One.

The risk of invasive plants including Japanese Knotweed should be assessed for Phase ONE.

Ground investigation is required for the southeast soggy area to identify any relationship with underlying geology.

The conceptual site model for hazardous gas should be developed to take account of any shallow worked seams or significant thickness of made ground.

A Conceptual Site Model and contaminated land risk assessment should be provided for the site to address the above points either in a revised desk study or a comprehensive Phase II Report (Phase ONE area).

The development is relatively insensitive to contamination, but given what is known about the Phase ONE site from the constraints report it would be reasonable to apply conditions on the site for a Phase I and Phase II report given that the current desk study phase is considered to be incomplete. However if a Phase II report is provided to address the outstanding matters then discharge of both conditions together may be considered. Conditions for a Remediation Strategy/verification plan, Verification and unexpected contamination are considered to be appropriate.

Further information was submitted and reviewed namely Sunderland IAMP Geotechnical Desk Study Constraints Report by WSP dated March 2016 (ref. 20160314-RH-Geotechnical Desk

Study Constraints-Issue 1.0). The Constraints Report covers a wider area than the Phase ONE development. Public Protection and Regulatory Services considers that land contamination does not appear to be a significant constraint to development and recommends the inclusion of conditions in respect of an updated phase I investigation, phase II investigation, remediation strategy/verification plan and validation report, in addition to a condition in respect of dealing with unexpected contamination.

The additional information has been considered and Environmental Health has made the following comments regarding our assessment;

For clarity, an on the basis of the most recent review summarised in the table below, PPRS recommends the inclusion of conditions in respect of the following, on any subsequently granted consent for the proposed development

1) Phase I / Phase II acceptable for overall planning;
2) Shallow mining risk assessment & remedial strategy / verification plan for ground stability is required for structures in each Unit;
3) Verification of shallow mine treatment (if required) for each Unit;
4) Condition for unexpected ground conditions for each Unit (including assessment of any contamination found in Building 226 (Unit 4).

Land Contamination :

Contamination

Previous comments related to the entire development including the former RAF officer's camp, however, Phase ONE is almost entirely Greenfield.

There is one small anomaly concerning Building 226 which lies on the site. It is proposed that an appraisal of environmental risk be made when the concrete base is taken up during development. Given the low risk anticipated for the proposed land use (roadway in an industrial land use) and better access granted to the subsurface following removal of the foundations, this is considered to be a pragmatic approach. The Applicant suggests that a Condition may be applied to these works to ensure any environmental risks are resolved prior to further development of Plot 4. Public Protection and Regulatory Services has no objection to this approach.

It is noted that Dunelm has not referenced the speciated PAH testing reported in the Ground Investigation Report. Additional testing of three samples of topsoil (0.2mbgl) has been supplied by Dunelm for Unit 3 including speciated PAH testing in Geoenvironmental Appraisal for Land at IAMP Unit 3 (22/3/2018). This has provided confirmation that the samples were not contaminated with the chemicals of concern, although a minor content of brick, glass and ceramics in topsoil was evident in the trial pits.

Mining

A copy of the Coal Mining Report has been provided in the Ground Investigation Report (MD15.003_001 – 21 February 2018) and this adequately settles the issue for recorded mine workings.

In relation to the risk of shallow unrecorded mining, and due to faulting and complex geology it is not possible to match individual seams with the stratigraphic record to prove conclusively what seams the coals represent, and whether they are consistent in thickness or if they were known to

have been mined (or not) in the district. Furthermore, the boreholes are relatively widely spaced and may not adequately characterise the conditions under individual buildings. The impact depends on the type of foundations in addition to the sensitivity of the structures. It is recommended therefore that Conditions be placed on the developer of each structure to consider whether mitigation is required for the risk of shallow mining

Invasive Plant Species

Lichfield have confirmed that Himalayan Balsam only affects the Phase TWO site therefore this is not a constraint for Phase ONE

Soggy Ground

The reference to “soggy” emanates from the WSP Geotechnical Constraints Desk Study site walkover for the wider area. The location in question is centred just north of the Phase ONE area and therefore there is unlikely to be a direct bearing on this application. The closest borehole is BH14, which was observed to have high groundwater levels just above the Lower Glacial Till. No instruments were placed at shallow depth but it might be presumed that the water table was near ground surface. A direct connection to water at depth seems to be less likely given the thickness of laminated clay (>10m) and small rise in the intervening strike at c.27mOD. There does not seem to be a particular contamination issue for example due to a preferential pathway so therefore no further comments are made in this respect.

Hazardous Gas

The conceptual site model and risk for ground gases have been addressed in the Ground investigation Report

Summary

In conclusion, it is recommended consideration of the risk of shallow mining be considered on an individual unit by unit basis be required by condition attached to any granted consent. The designers will need to consider whether the risk of shallow mining for the specific design and placement of structure is sufficient to warrant further subsurface investigation.

The risk for contamination at Building 226 is mainly a hazard for development since this structure lies under the planned road. A Condition could be included for full evaluation of the risks once the concrete standing has been broken out and the ground can be inspected however, this could be appropriately dealt with under “unexpected contamination”..

Summary Conclusion on Land Contamination

The proposed development is considered to be in compliance with the National Planning Policy Framework paragraphs 109 and 120 and policy EN14 of the adopted Unitary Development Plan. If members are minded to Grant Consent it is recommended that conditions being imposed as recommended by Environmental Health.

14 Air Quality ,Noise and Vibration;

Sections D and E of the Environmental statement covers aspects of Air Quality, Noise and Vibration , the comprehensive report has analysed the potential impact Air Quality, Noise and Vibration.

Section 11 : Conserving and Enhancing the Natural Environment of the NPPF provides relevant guidance on noise, namely paragraph 123 states that:

"Planning Policies and decisions should aim to:

- Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
- Mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from new development, including the use of conditions;
- Recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and
- Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."
- Policies EN5 and EN6 of the UDP both require the applicant to undertake assessments and set out mitigation, where proposals are likely to demonstrate unacceptable levels of noise or vibration or are to be exposed to unacceptable levels of noise or vibration from adjacent users. Each of the aforementioned polices are considered to be fully compliant with the NPPF.

Construction Phase

The Assessment has been undertaken in line with IAQM Guidance on the assessment of dust from demolition and Construction (2014). This method considers the magnitude of the dust emission from earthworks, construction and vehicle trackout whilst also assessing the sensitivity of receptors to dust effects, the numbers of receptors and their proximity to the site. The method also considers the baseline PM10 concentration within the affected area. The full construction dust assessment is included as an Appendix (D1) to the document and concludes that the risk of impacts for the development without mitigation are considered to be medium risk for human health from the 3 potential sources. It is therefore important that these impacts are mitigated against through the formulation and implementation of Site Specific Mitigation Measures which will be incorporated into the Construction Environmental

Management Plan (CEMP) incorporating a Dust Management Plan and agreed with the LA Environmental Health Officer prior to construction commencing.

Operational Phase

The EPAUK/ IAQM 2017 Guidance has been used to determine whether a detailed air quality assessment is required. There are various criteria that will trigger such an assessment and in this case it is the development causing a significant change in LDV and HDV flows that has required a detailed assessment.
It is stated that the development will have no significant point source or fugitive emissions from industrial premises and the energy strategy is an all-electric solution meaning no combustion plant are required. Therefore a quantitative assessment of effects from road traffic emissions associated with the development has been undertaken. Pollutants considered within the scope of the report are NO2, PM10 and PM2.5 and these will be assessed at nearest sensitive receptors. Ecological receptors have been scoped out of this assessment as no Natura 2000 sites are located within 200m of the affected roads.

The assessment uses a baseline of the existing AQ in the area using 2016 background concentrations and then predicts future concentrations with the development in place and then without development in 2020. Emissions from committed developments have been added in both future scenarios. An recognised Air Dispersion model, ADMS-Roads, has been used.

Annual mean concentrations of NO2, PM10 and PM2.5 were predicted for 17 sensitive receptors and the % change in concentration calculated.

Concentrations of NO2 were reported in Table D16 and generally were less than 75% of the Air Quality Standard (AQS) of 40µg/m3. However at receptor ADM08 concentrations for future scenario with development are 34.6µg/m3 which represents 86% of the AQS. The concentration without development has also been calculated at 34.46µg/m3 and so is marginally less with a % change in concentration of 0.4. This receptor is within close proximity to the A1290 however, is located in an open location which is anticipated to aid dispersion. Concentrations of NO2 decline with distance from the road source. The report describes the largest adverse impact as being at receptor ADM16, however from the table it would appear that it is actually at ADM15. Regardless, the % change at this receptor is calculated at 0.5% which is considered negligible by the EPUK/ IAQM Guidance.

Concentrations of PM10 were predicted and presented in Table D17. The highest concentration was reported at receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 40µg/m3 for PM10 and therefore can be considered negligible. PM2.5 concentrations have also been modelled and presented in Table D18.

Again the highest concentration was calculated for receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 25µg/m3 for PM2.5 and therefore can be considered negligible.

Therefore no additional or monitoring measures are suggested for the operational phase and this phase is not considered significant in terms of the impact on local air quality.

Summary:

The scope of the assessment covers a qualitative assessment of dust impact from the construction phase and a quantitative operational phase assessments of the effects of road traffic emissions. Relevant guidance has been used in both cases to inform the method of assessment. PPRS considers that the assessment is a fair appraisal of the likely impacts of the development on air quality. The conclusions are accepted and no further information is required.

To minimise the impact on air quality from the construction phase, a condition to provide a Dust Management Plan has been recommended as detailed below. The operational phase is deemed likely to have a negligible impact on air quality and as such, no further actions are required.

Recommendations.

1. Submit and implement a Dust Management Plan for the approval of the LPA incorporating the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement

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Local Planning Authority request for clarification

Noise (Chapter E): Similarly to The Air Quality Chapter of the ES, The Noise Chapter considers both the construction phase and operational phase of the proposed development. Points which required further explanation or clarification are detailed below; Paragraph E3.2.1 considers the

construction phase of the proposed development. With the exception of internal slabs and internal fit out, anticipated noise levels have been modelled.

• Are the internal slabs likely to be powerfloated?

Applicant's response to request

This level of detail is currently not known; however, research indicates that a powerfloat machine has sound pressure level of 105 dB(A) @ 1m, and is therefore less noisy than many of the items of heavy construction plant used in other stages of construction (which meet the derived evaluation criteria at Noise Sensitive Receptors (NSRs), therefore if powerfloating is used, the associated noise impacts are anticipated to meet the criteria.

Local Planning Authority request for clarification

• Modelled data/contour maps should be provided to support the predicted noise levels.

Applicant's response to request

A noise contour map for the noisiest stage of construction works is provided in the attached figure. The contour plot is based upon construction noise data contained in Chapter E (refer to Table E10 and Appendix E1).

Local Planning Authority request for clarification

HGV movements during the construction phase have been provided by the SYSTRA (traffic consultants) and the associated noise impact on A1290 is predicted as negligible.

• Does the assessment included the significant number of vehicle trips associated with material movement (e.g. soil) offsite?

Applicant's response to request

Yes; 225 vehicle arrival movements per day during the construction stage, of which 145 are HGV movements (including 30 associated with the removal of topsoil; refer to Figure L7, Chapter L: Access and Transport for a breakdown) have been included in the assessment. This is a 3% increase over projected 2020 traffic flows on the A1290, and is therefore significantly below the 25% increase in flow required to generate an increase of greater than 1 dB.

Local Planning Authority request for clarification

• Has the traffic data been confirmed by SCC Highways? Supportive data should be provided.

The transport modelling work has been scoped and agreed with Sunderland City council's Highways Department. They have not raised any issues with the traffic data.

Local Planning Authority request for clarification

Section E3.2.2 advises that construction significance criteria have been derived from BS5228 in accordance with the ABC method, using measured baseline noise levels. The noise criteria levels are presented in Table E9, but the process of derivation should be clearly explained.

Applicant's response to request

Section E2.6 – summary of the BS5228 guidance, and Section E3.3 – Significance Criteria – Construction Phase, provide further detail on the application of BS5228 ABC method. Measured baseline noise levels reported in Table E.8 have been used to derive threshold criteria in accordance with the method provided in the BS5228 for the corresponding noise-sensitive receptors, see Table E.1.

As noted in Chapter E, Category A values have been chosen for all NSRs during the evenings and weekends period.

Local Planning Authority request for clarification

Proposed construction hours are 07:00 – 18:00 Monday to Friday, 08:00 – 17:00 Saturdays and 07:00 – 14:00 on Sundays and Bank Holidays by agreement. Whilst the surrounding area is industrial in nature, the development site is within extremely close proximity to residential receptors. Has consideration ben given to a slightly delayed start time of 08:00, particularly for noisy activities. Prior consent should be sought from Public Protection and Regulatory Services prior to undertaking any noisy out of hours workings. A start time of 07:00 hrs on Sundays and Bank Holidays for noise generating activities is unlikely to be considered to be reasonable.

Applicant's response to request

The nearest residential receptor adjoins the boundary of the IAMP ONE Site at West Moor Farm (a cottage to the rear). North Moor Farm lies 160 m distant from the site boundary. Residential properties on Washington Road lie within 40 m from the proposed culvert and on the opposite side of the A1290 to the IAMP ONE Site. Assessment has been completed on the basis of information provided and the available guidance. Additional mitigation measures to protect residential amenity at receptors close to the proposed development during construction will be integrated into the CEMP.

Local Planning Authority request for clarification

Section E3.3.1 advises that noise from external plant has not been modelled as it has been assumed that appropriate silencing will be provided and or plant will be enclosed. This is a significant assumption since outdoor plant has the potential to generate significant levels of noise. It would be prudent to clarify an appropriate noise limit for external plant to assist in the design and selection of suitable equipment.

Applicant's response to request

We are not aware of any proposed external plant items. Noise from external plant at NSRs will vary according to the plant's proximity to the NSR and screening provided by the buildings of the IAMP development. Application of a single maximum noise level for external plant across the may therefore place unrealistic and unnecessary restrictions on plant selection.

The following draft planning condition is suggested:

No construction work shall take place on any building until a **Noise Assessment** has been submitted to and approved in writing by the Local Planning Authority which considers the specific noise sources within that building or forming external plant associated with that building and provides details of any mitigation measures. Thereafter, the development shall be implemented in accordance with the approved details. Reason: In the interest of the amenity of adjacent properties and to accord with the NPPF, Policy EN5 of the UDP and Section E6.2 of Chapter E (Noise) of the IAMP ONE Environmental Statement. Each noise assessment will therefore determine the maximum noise level for external plant for each unit, and will take account of the unit's proximity to NSRs, and screening of plant noise provided by the IAMP buildings.

Local Planning Authority request for clarification

Predicted HGV vehicle movements per hour considered to be 5 HGV movements per hour during the day and 2 at night. It is unclear whether these figures relate to the site as a whole (this would equate to less than 1 HGV movement per hour to each unit during the day) or to each individual unit. It does not appear that noise associated with deliveries to and from site have been considered, particularly if these take place at night.

Applicant's response to request

Daytime and night-time HGV movements have been considered; the movements reported related to the IAMP ONE site as a whole, however, assuming 5 HGVs per unit (daytime) and 2 HGVs per unit (night-time) results in an increase of 0.5 dB or lower at each of the identified Noise Sensitive Receptors, which does not change the outcome of the assessment.

Receiver Predicted LAEq

5 movements/hr (day)
2 movements/hr (night)
Predicted LAEq
45 movements/hr (day)
18 movements/hr (night)

Name
Day Night Day Night
dB(A) dB(A) dB(A) dB(A)
Washington Rd 29.6 29.6 29.9 29.7
Travellers Site 14.3 14.2 14.8 14.5
N Moor Fm 27.2 27.1 27.7 27.5
Hylton Br Fm 26.5 26.4 27.0 26.7
W Moor Fm 29.2 29.2 29.4 29.3

Local Planning Authority request for clarification

Section E3.3.2 includes Table E11 which contains the calculated noise limits as a comparison against the measured background noise data. Baseline noise data is discussed in section E4. Explanation of the derivation of background noise levels at each NMP should be provided i.e. are they the arithmetic average or most frequently occurring measured level?

Applicant's response to request

Baseline data analysis determined that the arithmetic mean and the mode were highly consistent at each of the monitoring locations; the greatest variation between the mean and the mode was

approximately 2 dB, and the mean was predominantly lower (more conservative) than the mode. At some locations it was not possible to determine the mode due no recurring values (to 1 decimal place). The arithmetic mean was therefore used for all locations.

Local Planning Authority request for clarification

Reference is made in Section E5.2 to penalties due to characteristics of noise being calculated with appropriate penalties being awarded for tonality and on off characteristics. There is no discussion as to the appropriateness of an impulsivity penalty.

Applicant's response to request

Apart from Unit 3, for which full planning permission is applied for, the application is in outline, allowing for a range of potential manufacturing uses, each of which may produce noise emissions of different characters. A generic penalty of +7dB was therefore applied, which specifically considered both tonal and intermittent penalties as set out in BS4142. Draft planning condition 8 (detailed above) would require that a noise assessment of each unit will be undertaken prior to commissioning, with the outcome that all potential audible characters (tonal, intermittent, impulsive and other) will be considered in greater detail, and appropriate mitigation put in place to suppress the audibility of these at NSRs, thereby minimising the applicable penalties.

Local Planning Authority request for clarification

Section E5.3.1 considers noise model verification. Table E13 provides a comparison between measured and predicted data. The table does not include the measured levels used for this purpose, and the resulting level difference does not appear to reflect the measured levels reported in Table E8 and it would therefore be useful if the measured data could confirmed. Calculations used in the derivation of Lday and Lnight should also be confirmed.

Applicant's response to request

Data used is LAeq,T value reported in Table E8, which have been compared with Lday and Lnight values.

Local Planning Authority request for clarification

Calculations used in the derivation of Lday and Lnight should also be confirmed.

Applicant's response to request

The assessment states that Method 3 of the TRL study was used. L10,18hr

Formulas used as follows:
Lday = 0.95 x LA10,18hr+1.44dB
Lnight = 0.90 x LA10,18hr - 3.77dB

Local Planning Authority request for clarification

Notwithstanding the above, and whilst Table E13 indicates good correlation between measured and predicted data for NMP2 and NMP5, there is a significant amount in various in other monitoring locations, leading to uncertainty in the validity of the model. Further information should be provided to provide reassurance in this respect.

Applicant's response to request

The assessment noted: i) 18-hour traffic flows provided for use in the noise assessment, ii) specific characteristics of roads in the area, and iii) notable shift change traffic on the A1290, may skew the comparison of measured and predicted values due to short-duration high flows. Hence, the assessment considers the change, rather than absolute levels, which average-out these events.

Local Planning Authority request for clarification

Table E14 looks at future baseline levels in 2020 and also 2020 with and without the scheme. Although the DMRB long term noise level criteria has been used as a basis for assessment, no long term comparison has been made. Whilst it is acknowledged that the proposed units will not all become operational at once, occupancy is unlikely to extend to the 15 yr long term period suggested. It is therefore considered that the short term criteria level referred to in section E3.4.2 is perhaps be more appropriate. Clearly this will have an impact on the significance assessment in E5.3.2.

Applicant's response to request

The phasing of the development and occupation of the units has been assumed to be somewhere between the "short-term" (e.g. opening year of first completed/ occupied units) and "long-term" (approx. 15 years). The long-term criterion was therefore adopted, rather than deriving an intermediate value.

Local Planning Authority request for clarification

The Council's Environmental Health Officer has requested clarifications about the assessment of the long-term change in traffic related noise levels (typically year of opening +15 years).

The Noise Assessment evaluates the change in noise due to road traffic based on an assumed long-term occupation, i.e. the full development will not be occupied immediately, and therefore assumes a build-up in traffic over a number of years (i.e. opening +5 to 15 years). Accordingly, the noise assessment is undertaken based on this conservative approach and utilising the long-term Design Manual for Roads and Bridges (DMRB) criteria (the industry standard) for assessing change in traffic noise.

The traffic growth modelling was undertaken for a number of scenarios, one of which assumed full occupation by a default year of 2020. The year 2020 was used as the future year because this is the proposed opening year for the IAMP ONE development. The projected traffic flows for the "with development" scenario includes all development traffic (i.e. full occupation of all IAMP ONE units). Given the full occupancy assumption of the traffic projections, there would be no increase to development-generated flows over the 15 year period from opening.

If a +15 year scenario was considered, the only increases to traffic flow would be increasing non-development (baseline) traffic flows. The percentage of the development traffic as a percentage of total traffic on the local road network would then show a proportional decrease compared to baseline. The assessment is therefore conservative, as predicted levels assume full occupancy from the start, whereas this is unlikely to be the case.

The Council's Environmental Health Officer also asked for the modelled noise contour maps associated with traffic noise to be provided so that the mapped roads can be identified, and the

contour maps for the predicted levels of operational noise. Please find enclosed the following three noise contour drawings:

• Future traffic noise without development, dBLA10,18hour

• Future traffic noise with development, dBLA10,18hour

• Operational phase, dBLAeq,T

The drawings show noise contour maps and illustrate dB values (colour coded contours– refer to the legend) based upon the outputs from the CadNa noise modelling software**.**

Applicant's response to request

Our noise consultants have assessed the A1290 Glover Road receptor area for traffic noise (2016 baseline, 2020 future baseline (including committed development but without IAMP ONE) and 2020 future baseline (including committed development plus IAMP ONE).

The screenshots below have been extracted from the noise modelling software using the AAWT 18 hour traffic data provided by Systra.

The relevant dB values are also shown on the images – the dB points are at the same locations on all three images.

These illustrate very little change in predicted noise levels at this receptor point (e.g. 60 dB in 2016 Baseline, 60.4 dB 2020 Future+Committed Dev, and 60.6 dB 2020 Future+Committed Development+IAMP ONE).

This is a result that the traffic volume increases are in smaller vehicles rather than HGVs.

Further to Public Protection and Regulatory Services' initial response to the proposed IAMP One Development, further significant consideration has been given to the submitted documentation. It is considered that the proposed development is acceptable subject to appropriate conditions which are outlined at the end of this assessment.

Details of the assessment undertaken by Public Protection and Regulatory Services set out below;

Air Quality

Chapter D considers the potential impact of IAMP One, in respect of both the construction and operational phases of the proposed IAMP One Development.

Construction Phase:

The Assessment has been undertaken in line with national guidance produced by the Institute of Air Quality Management on the assessment of dust from demolition and Construction (2014). This method considers the magnitude of the dust emission from earthworks, construction and vehicle trackout whilst also assessing the sensitivity of receptors to dust effects, the numbers of receptors and their proximity to the site. The method also considers the baseline PM_{10} concentration within the affected area.

The assessment concludes that without mitigation the risk of impacts are of medium risk for

human health. These impacts can be mitigated through the identification and implementation of site specific mitigation measures and it is therefore recommended that these are addressed by a stand alone Dust Management Plan or incorporated into the site Construction Environmental Management Plan (CEMP). The details of mitigation should be agreed with the LPA prior to the commencement of construction activities on site.

Operational Phase: The Assessment has considered the potential sources of air pollutants associated with the proposed development, once operational. It is not anticipated that the development will have significant point or fugitive emission sources from industrial premises and the development is intended to be fuelled by electric rather than combustion.

In accordance with Environmental Protection UK/ Institute of Air Quality Management 2017 Guidance, the Applicant has identified that changes in both light and heavy delivery vehicle flows required more detailed consideration and therefore a quantitative assessment of effects from road traffic emissions associated with the development has been provided.

The assessment considers Nitrogen dioxide ($NO_{2)}$ and Particulate Matter (PM_{10} and $PM_{2.5}$) which are both assessed at nearest sensitive receptors. Ecological receptors have been scoped out of this assessment as no Natura 2000 sites are located within 200m of the affected roads.

The assessment has used existing air quality data (2016) in the locality as a baseline upon which future concentrations (2020) both with and without the development in place have been predicted. Emissions from other committed developments have also been included in both future scenarios. Future concentrations have been predicted using a recognised Air Dispersion model, ADMS-Roads.

Annual mean concentrations of NO_2, PM_{10} and $PM_{2.5}$ have been predicted at 17 sensitive receptor locations and the percentage change in concentration calculated.

Concentrations of NO_2 are reported in Table D16 and are typically less than 75% of the Air Quality Standard (AQS) of 40µg/m^3 at all locations. At receptor ADM08 however predicted concentrations for 2020 with IAMP One in place slightly elevated by comparison at 34.6µg/m^3. This value does not exceed the AQS, but is slightly higher than other receptor locations, most likely as a result of the roadside location. It should be noted however, that concentrations at this location have also been predicted in the absence of the IAMP One Scheme and, without the development and associated traffic, are anticipated to be 34.46µg/$m^{3.}$ The difference between concentration levels with and without the IAMP One scheme in place represents an increase of 0.4%. EPUK/IAQM Guidance rates this percentage increase as **NEGLIGIBLE**.

The report describes the largest adverse impact at receptor ADM16, however from the table it would appear that it is actually at ADM15. Regardless, the % change at this receptor location is calculated at 0.5% which is considered **NEGLIGIBLE** by the EPUK/ IAQM Guidance.

Concentrations of PM_{10} have been predicted and presented in Table D17. The highest concentration was reported at receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 40µg/m^3 for PM_{10} and are therefore considered to be **NEGLIGIBLE**.

$PM_{2.5}$ concentrations have also been modelled and presented in Table D18. The highest concentration has been calculated at receptor ADM08. All of the results with the development in place were less than 75% of the AQS of 25µg/m^3 for $PM_{2.5}$ and therefore can be considered **NEGLIGIBLE**.

On this basis the operational phase of the development is **not considered significant in terms** of the impact on local air quality.

Noise

The objective of the noise impact assessment is to gain an overall appreciation of the noise climate in the study area around the proposed development, and an understanding of the impact that the development may have.

In respect of the proposed development, noise impact may arise from construction activities, the operation of the proposed units (both internal and external noise sources) and from road traffic associated with vehicle movements to and from site. The noise impact assessment contained in Chapter E of the Environmental Statement not only characterises the existing noise climate on and around the IAMP site but also considers each of these potential noise sources

Characterisation of existing noise climate

A 1km buffer around the IAMP One site boundary has been considered in relation to potential noise impacts. This study area includes the residential receptors most closely located to the proposed IAMP site, and therefore those most likely to be impacted by associated with the construction and operational phases (including traffic movement) of the development.

Noise measurements were made at 6 locations which surround the IAMP One site over the course of the 23 and 24 November 2017. A long term (24hr) measurement was made at Noise Monitoring Position (NMP) 1 on Washington Road in order to fully characterise existing traffic noise, whilst short term measurements were made at the remaining locations.

At most locations ambient noise levels were reported to be dominated by road traffic noise either on the A1290 or A184 and, to a lesser extent, by local industrial noise sources.

Table E8 summarises the measured ambient and background noise levels at the 6 noise monitoring positions both during the day and at night. Public Protection and Regulatory Services considers this adequately represents the existing noise climate around the proposed IAMP One site and are appropriate for use in the assessment of any likely noise impacts associated with its' development.

Construction Noise: Anticipated construction plant has been considered in combination with the amount of time that it is likely to be in operation whilst construction activities are underway. Noise modelling software has been used to predict resulting noise levels at nearby sensitive receptor locations to enable appropriate noise limits derived in accordance with the nationally recognised 'ABC' method (British Standard 5228:2014).

Table E10 and the recently provided noise contour plan indicate that even at the noisiest stages of construction, noise levels are not anticipated to exceed the determined noise limits at nearby residential premises.

The impact of construction noise is therefore considered to be of **LOW SIGNIFICANCE**.

Projected construction traffic movements (HGVs) have also been evaluated. It is anticipated that the resulting noise impact will be less than +1dB and therefore **NOT PERCEPTIBLE**.

A Construction Environmental Management Plan (CEMP) is required, in line with the requirements of the IAMP Area Action Plan, to ensure that construction of IAMP One is

adequately managed to minimise the potential for unreasonable impacts on nearby receptors.

No piling is proposed in the development of IAMP One and therefore vibration effects associated with typical construction activities are anticipated to be confined to within the IAMP One site boundary. Should piling become necessary, detailed assessment of noise and vibration impacts at nearby sensitive receptor locations must be undertaken and submitted to the LPA as part of the CEMP.

Operational Noise: Residential receptors contained within the 1km buffer zone are considered to be the most sensitive in terms of noise associated with the operation of IAMP One. If these receptor locations are adequately protected against adverse impact from noise, those located at a greater distance, for example those located to the east of the A19, will benefit from a greater level of protected given the level of noise attenuation associated with distance, atmospheric absorption and ground absorption. British Standard 4142: 2014 is a nationally recognised standard for measuring commercial and industrial noise, and provides an assessment method relative to likely impact experienced by sensitive receptors. It suggests that where a noise, once corrected for certain acoustic features, exceeds the "background" noise level by around 10 dBA or more, a significant adverse impact is anticipated. A difference of around 5 dBA 'indicates an adverse impact'; at a difference below 5 dBA, the lower the adverse impact and below 0dBA low adverse impact likely. For the purpose of this development, Public Protection and Regulatory Services consider that operational noise from the development should not exceed 5dB below the existing measured background noise levels to ensure that impact is minimised.

At this stage a detailed assessment of future noise levels arising from the operation of IAMP One is not possible as the specific details of the site end users, and the noise associated with these activities has not yet been determined. The noise assessment has therefore considered noise limits for operational noise, relative to the existing noise climate and based on the criteria outline above, and has considered potential future operational noise to determine whether these noise limits can be met.

The resulting rated noise limits (i.e. operational noise + appropriate acoustic penalties) at each noise monitoring position are contained in Table E11 for both the daytime and night time periods.

Anticipated rated operational noise levels have been modelled to determine whether the noise limits in Table E11 are capable of being met. The assessment assumes that all units within IAMP One will be operational continuously during the daytime and night time to present a worst case scenario. In all cases, predicted operational noise limits are anticipated to fall below the identified noise limits at each receptor location and therefore of **LOW IMPACT**.

Given that the assessment is predictive in nature at this stage, based on modelling and significant assumptions, it is considered appropriate to require each individual unit to be supported by a noise assessment which considers ALL operational noise from both internal and external noise sources (plant and delivery noise), and any mitigation required to ensure that the noise limits identified in table E11 can be achieved at each noise sensitive receptor, prior to the construction of each unit. Once approved by the LPA, the development should be implemented in accordance with the approved details in order to safeguard the existing noise climate at noise sensitive locations.

Additionally, validation monitoring should be undertaken once each individual unit becomes operational to demonstrate that the assumptions made in the model and building design are accurate in order to safeguard residents, protecting them as far as reasonably practicable, from excessive levels of noise.

Any plant which may generate high levels of vibration during the operational phase of IAMP One should be specified appropriately prior to installation, such that resultant vibration levels at the nearest residential receptors are below the threshold of perception (provided in BS 5288).

Road Traffic Noise: Chapter E of the Environmental Statement evaluates the change in road traffic noise associated with the use of IAMP One, once occupied. Whilst it is unlikely that all units will become operational in the initial year of opening (2020) and traffic levels will gradually increase with occupation over a number of years, the assessment has assumed a worst case scenario, assuming that all units will be occupied from the outset.

Guidance on the assessment of changes in road traffic noise levels is contained in Design Manual for Roads and Bridges (DMRB). This nationally recognised document provides guidance on the threshold for potential significance of noise impact. A change of 1 dB(A) in the short-term is the smallest that is considered perceptible, whilst in the long-term a 3dB(A) change is considered perceptible

The most significant changes in noise level as a result of road traffic noise are anticipated to occur at West Moor Farm. This is unsurprising given its locality and proximity to the A1290. An increase of 1.7 dB is predicted during the daytime. DMRB rates this as a **MINOR** change in noise levels in the short term (i.e. in the unlikely worst case scenario that all of the IAMP One units were to become operational simultaneously in 2020) and a **NEGLIGIBLE** change in the long term. An increase of 1.2 dB is also predicted at Washington Road during the day, and 1.9 at night. Once again DMRB rates this as a **MINOR** change in noise levels in the short term and a **NEGLIGIBLE** change in the long term.

Additionally, DMRB suggests that an increase in road traffic noise of 1dB is likely to be experienced where traffic flows are anticipated to increase by 25% or more. On this basis, and to safeguarding all sensitive receptors against road traffic noise impacts, the traffic data provided by the Applicant has been reviewed. Locations where such increases are anticipated have been detailed in Chapter E and the recently submitted noise contour plots. The only receptor location not considered in Chapter E (due to its significant distance from the IAMP One site itself) is A1290-Glover Road, where traffic flows are anticipated to increase by approximately 32%. The Applicant has undertaken further detailed analysis of the anticipated noise impact in this area using noise modelling software and predicts that the resulting impact in road traffic noise as an increase of 0.6 dB. DMRB rates this as a NEGLIGIBLE change in both the short and long term.

On this basis Public Protection and Regulatory Services **do not anticipate any significant adverse impact associated with changes in road traffic noise** as a result of development led vehicle movement.

Recommended conditions

Construction Environmental Management Plan

No construction work shall take, until a site specific Construction Environment Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

1. An updated detailed assessment of noise and vibration impacts on sensitive receptors specific to construction methods and practices, in accordance with BS 5528, and the resulting impact levels and the receptor locations identified in Section E1.2 of Chapter E of the submitted Environmental Statement.

2. Demonstration that the resulting noise impact levels are compliant with the threshold limits contained in Table E9 os Chapter E of the submitted Environmental Statement.
3. Where the threshold limits contained in Table E9 of Chapter E of the submitted Environmental Statement cannot be achieved, identification of necessary mitigation measures required to achieve these limits at the identified receptor locations.
4. Details of compliance monitoring, including monitoring locations and durations
5. Procedures for maintaining good public relations including complaint management, public consultation and liaison, arrangements for liaison with the Council's Public Protection and Regulatory Services Team;
5. Hours of construction, including deliveries;
6. Control measures for dust and other air-borne pollutants (where a separate Dust Management Plan is not provided); The control measures shall, as a minimum, incorporate the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement.
7. Siting and set up/establishment of site compound area;
8. Measures for controlling the use of site lighting whether required for safe working or for security purposes;
9. Operation, loading and unloading of plant and materials;
10. Storage of plant and materials used in constructing the development;
11. Wheel washing facilities;
12. Parking of vehicles of site operatives, delivery vehicles and visitors

Dust Management:

No construction work shall take, until a site Dust Management Plan has been submitted to and approved in writing by the Local Planning Authority. The DMP shall, as a minimum, incorporate the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement.

Operational Noise:

No construction work shall take place on any building unit until a noise assessment has been submitted to and approved in writing by the LPA which considers all noise sources (internal and external) associated with the operation of that unit and the resulting noise levels at noise sensitive receptors. Where noise levels are anticipated to exceed the limits contained in Table E11, the report shall specify the mitigation measures necessary to achieve these levels. Thereafter, the development shall be implemented in accordance with the approved details

Should the Council, as the Local Planning Authority, receive noise complaints that are subsequently substantiated by the Local Planning Authority in respect of the onsite operations hereby approved within 6 months of the commencement of development, then on written notification of this to the operator, the operator shall submit a noise assessment within 28 days of this written notification in accordance with a methodology to be agreed in writing by the Local Planning Authority. In the event that this assessment shows that the rated noise levels limits (determined in accordance with BS4142) contained in table E11 of Chapter E of the Environmental Statement are exceeded, the Operator shall then identify further mitigation measures in order to comply with the rated and maximum noise levels for the consideration and written approval of the Local Planning Authority. The approved mitigation measures must be put in place in accordance with a timescale to be agreed in writing by the Local Planning Authority.

Following the introduction of the physical or managerial measures, a further noise assessment shall be carried out within 28 days to demonstrate compliance with the noise limits contained in Table E11 of Chapter E of the Environmental Statement

Operational Vibration:

Any plant which may generate levels of vibration which exceed the Vibration Dose Values in Table 1 of BS 6371-1:2008 relating to 'low probability of adverse comment' at the nearest sensitive receptor shall be specified to the LPA prior to installation. Where vibration levels greater than or equal to this value are anticipated to be experienced by residents, an assessment in accordance with BS 6472-1 2008 and/or other guidance approved for use by the LPA, shall be submitted to the LPA for written approval. The assessment shall detail the measures necessary to reduce vibration levels below this threshold shall be submitted to the LPA for approval. Thereafter, the development shall be implemented in accordance with the approved details.

Summary Conclusion on Air Quality, Noise and Vibration

Chapter D of the Environmental Statement concludes that in all cases the modelling predications are sufficiently below the respective AQS that any systematic under prediction in the modelling assessment is unlikely to affect the conclusion of the Air Quality Study.

Overall, the Noise & Vibration Chapter of the ES has assessed the noise effects of the development as not significant. It is therefore considered that the proposals accord with UD Policies EN1 (Environmental Protection) andEN5 (Noise and Vibration) and AAP Policies EN4 (Amenity) and Policy E18 (Noise-Sensitive Development).

The Local Planning Authority is satisfied that the proposed development complies with both National and Local Planning Policy as set out above. The proposed development can achieve a satisfactory form of development subject to conditions being imposed should members be minded to Grant Consent.

Chapter E Noise of the Environmental Statement concludes

The noise assessment has assessed construction and operation phases. Potential vibration effects have been scoped out during the construction and operational phase, as no significant vibration effects are anticipated during the construction phase. A detailed vibration assessment will be undertaken of equipment likely to produce significant vibration during the operational phase, and mitigation adopted where appropriate. The potential impacts of the proposed application on existing noise sensitive receptors resulting from both the construction and operational phases has been quantified and there significances is documents within the Environmental Statement.

The prevailing noise levels at the applciation site were established through baseline noise survey. Measured baseline noise levels were used in combination with predicted construction and post development phase noise levels to deteremine compliance with evvulation criritria agreed with the Counil.

During the construction phase, no significant impacts are anticpaited. A construction environemental plan will be completed to minimise adverse noise effects at existing noise sensitive properties. This will include a detailed assessment of noise and vibration associated with piling, should it be deteremined piling is required.

In the operational phase, mitigation has been specified to enable cumulative noise levels from the individual units of the proposed application to meet the derived noise limits at existing noise

sensitive properties. Mitigation measures include specification of a building envelope that appropriately attenuates transmission of internal noise from the proposed industrial units and the attenuation of external plant. It is recommended that further assessment and monitoring be provide that can be controlled through planning conditions should members be minded to Grant Consent.

The Local Planning Authority has concluded that assuming that implementation of mitigation measures specified with the Environmental Statement Chapter E, residual noise impact have been identifies as not significant. Therefore in terms of impact there is no significant adverse impact.

The Local Planning Authority is satisfied that the proposed development complies with both National and Local Planning Policy as set out above. The proposed development can achieve a satisfactory form of development subject to conditions being imposed should members be minded to Grant Consent.

15 Waste

The application will be required to provide by a Site Waste Management Plan should members be minded to grant consent, due to size and scale of the development the plan will need to include details of the types and volumes of excavation and construction waste arisings from the IAMP ONE site. The Site Waste Management Plan will identify the re-use, recycling or landfill of waste arisings, which will be affected by factors such as potential hazards presented by the waste, the benefits of re-use, volumes of waste types and whether local markets exist to receive these waste streams. The Site Waste Management Plan will cover the management of all waste generated both during the construction and operation of the development.

It is recommended that if members are minded to grant consent, that a condition is imposed that a Site Waste Management Plan, should be agreed with the Local Planning Authority to ensure good development practise take place and to ensure compliance with policies Del1 of the Adopted Area Action Plan.

Sustainability

It is proposed that energy efficiency and sustainability will form an intrinsic part of the proposals.

The key elements are set out below.

Good practice will be followed throughout the development, making maximum use of natural heating and cooling processes in order to minimise energy consumption. The benefits of natural daylighting will be maximised in all building types, whilst ensuring that excessive solar gain is avoided through careful design. Buildings will seek to make best use of natural ventilation, with the free cooling that night time heat dissipation can bring.

Wherever possible a proportion of the energy requirements of the development will be addressed through the provision of onsite generation of renewable energy, which could include roof mounted photo voltaic panels.

The future development could incorporate several other measures to ensure that it is sustainable, is energy efficient and reduces CO2 emissions, which could include:

- Water efficiency and reducing water demand through low water efficient fittings;
- Water Recycling Systems;

- Sustainable Drainage System;
- Energy Conservation, adopting a 'Fabric First' approach to achieving an efficient building fabric with a high thermal mass;
- Energy efficient systems including low energy light fittings;
- Energy metering;
- Implementation of a Waste Audit;
- Provision for pedestrians and cyclists; and
- Implementation of a Construction Traffic Management Plan.

Prior to their implementation, the energy efficiency and sustainability measures will be assessed for suitability, technical review, installation costs, running costs, payback periods and plant space availability

The proposed sustainability element of the scheme that is proposed is considered acceptable in principle and is considered to comply with policies Del1, EN3,IN1, IN2, T1,D1,D2 andS1

16 Phasing.

From discussion with the applicant's agent it is anticipated that construction of the development will commence in June 2018 should members be minded to grant consent subject to suitably worded conditions.

The first phase of work will consist of habitat creation and management, as well as removing topsoil from across the site and constructing the spine. Construction of the first building (Plot 3) will commence in October 2018 and the development will be completed in February 2020. This represents a 21 month build period.

During the early stages of the project, off-site works associated with utility and drainage provision for the site will take place along the southern section of the A1290, immediately to the west of the Nissan factory entrance and along Washington Road. Particular care will be taken to ensure that appropriate traffic management measures are put in place to minimise any disruption to other road users during the peak traffic periods.

The applicant will be required to work closely with the Council and Highways England to ensure appropriate measure are in place and this will be done through suitable worded planning conditions or controlled by the relevant Council under section 278 of the Highways Act.

The development of the site includes a requirement for significant bulk earthworks and, wherever possible, material will remain within the site. However, there is likely to be a surplus of topsoil material which will not be required or have a suitable location for placement within the site, which will have to transported to a location off-site yet to be determined.

Chapter N of the Environmental Statement considers Risks and Accidents potential associated with development of IAMP One. A comprehensive document sets out the potential for risks and accidents, the key findings of the assessment are summarised below.

The vulnerability of IAMP One to different hazards was evaluated and a list of hazards identified. The effects of these potential hazards on the environment were assessed, with a number of moderate effects highlighted. It is considered that these can be effectively mitigated through management plans, which would be conditions if members are minded to grant consent. The management plans will be in part site wide plans with detailed design plans for each unit which will incorporate bespoke activities to the individual units.

The construction works to the individual plots within the site is anticipated to be undertaken at the same time as shared highway and main drainage works. The sequence of the delivery for each of

the plots, beyond Plot 3, has not been determined and will be resolved at a later date in response to occupier requirements and timeframes, this element of work will be controlled by suitable worded conditions on the hybrid applications to comply with policies T14 of the adopted Unitary Development Plan and policies S1, S2,D1,T1,IN1,IN2, Del1 and Del2.

17 Equality Act 2010 - 149 Public Sector Equality Duty

During the detailed consideration of this application/proposal an equality impact assessment has been undertaken which demonstrates that due regard has been given to the duties placed on the LPA's as required by the aforementioned Act.

As part of the assessment of the application/proposal due regard has been given to the following relevant protected characteristics:-

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

The LPA is committed to (a) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In addition, the LPA, in the assessment of this application/proposal has given due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This approach involves (a) removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The LPA has taken reasonable and proportionate steps to meet the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities, as part of this planning application/proposal.

Due regard has been given to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves. Particular consideration has been given to the need to
(a)tackle prejudice, and
(b)promote understanding.

Finally, the LPA recognise that compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

Conclusion

The proposed development has been robustly assessed in terms of local, national and international policies. The proposed development is considered to meet the aims, objectives and policies as set in the adopted Area Action Plan and it is further supported by the National Planning Framework document as set in the Principle of Development Section of the Report.

The proposals constitute sustainable development in the context of the Natation Planning Policy Framework and will clearly have a significant positive impact on the local and national economy, including employment generation. Moreover the jobs created will be skilled, accessible and attainable for members of the local community.

The development proposals accord with the up-to-date development plan and taking all relevant considerations from paragraphs 18 to 219 of the Natation Planning Policy Framework into account there should be a presumption in favour of the application proposals.

The IAMP ONE planning application has been comprehensively designed to ensure that they will not prejudice the delivery of IAMP TWO or the comprehensive development of IAMP as a whole, which includes reserving land for the future widening of the A1290, providing a road connection to the north west which can be extended in the future through the Southern Development Area and into the Northern Development Area and ensuring sufficient ELMA land is retained to provide the off-site ecological mitigation for the IAMP TWO, in accordance with the AAP.

The planning application has also demonstrated that the application proposals constitute sustainable development in the context of the National Planning Policy Framework. In particular they would have significant employment and economic benefits, including the following:

Construction Phase

- Between 985 and 1,435 direct construction jobs during 21 month build period;
- Between 1,485 and 2,165 additional FTE spin-off jobs in sectors across the UK economy (over and above the 172 to 251 direct FTE jobs);
- Local training / apprenticeship opportunities to increase local recruitment and local skills; and
- Between £54.0m and £78.6m of direct GVA for each year of the construction phase. Taking account of indirect and induced economic output effects, the total GVA could rise to between £130.0m and £189.4m per annum (at the national level).

Operational Phase

- Between 3,100 gross direct FTE jobs on the IAMP ONE Site when operational;
- Between £189m of additional direct GVA per annum, representing 4% of the GVA of Sunderland and 1% of the GVA of Tyne and Wear; and
- Approximately £4m in business rate payments per annum once completed and occupied and a total of £77.5m over an initial 25 year period.

The proposed planning application is considered to fully accords with the National Planning Policy Framework commitment to support economic growth and deliver the business and industrial units that the country needs, the Area Action Plan's objectives to build on the area's international reputation in the automotive industry; support Nissan and attract European-scale 'super-suppliers' linked to the automotive industry, as well as the Northern Powerhouse objectives which seeks to rebalance and growth the UK economy by fostering economic activity in the north of England.

In conclusion there are no material considerations which out-weigh the scheme's overall conformity with the up-to-date development plan (adopted Area Action Plan).

It is therefore recommended that Members Grant Consent , subject to the draft conditions set out below as the development is considered comprehensive development and will bring many benefits to Sunderland and the wider area set out above.

RECOMMENDATION: Members are minded to Grant Consent under the Town and Country General Regulations 1992 (as amended) and subject to the draft conditions list below

Draft Conditions:

Conditions for the Whole Site except Plot 3

Pre-Commencement Conditions

1 No development shall commence until a scheme for **the long-term management of the attenuation ponds A, B and C** as detailed in the Flood Risk Assessment & Drainage Strategy, Pond Layout and Detailed Drawings listed in condition xx has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodies within the scheme.

Reason: To prevent the increase risk of flooding, both on and off site for the lifetime of the development as defined in paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

2 In line with the submitted drawings for surface water construction details, the detailed design of the outfall structure from the downstream compensatory basin must be submitted prior to commencement.

Reason To ensure that proposed design can be constructed as planned and that flood risk and water quality are managed in line with paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

3 No development shall commence until a **Biodiversity Construction Environment Management Plan** (BCEMP) has been submitted to and approved in writing by the Local Planning Authority. The BCEMP shall include the following details:

i Site habitat clearance;

ii Pre-construction badger surveys;

iii Bird scaring techniques;

iv Protected species method statements;

v Invasive species method statement; and

vi Short term (construction timetable) habitat creation. (Longer term habitat creation will be described within a Habitat Management Plan)

Thereafter the development shall be implemented in accordance with the approved details.

Pre Commencement Ecology Conditions

4 No development, ground works or vegetation clearance within each phase of development hereby approved shall commence until a **Biodiversity Construction Management Plan inclusive of scaled plans for IAMP ONE** has been submitted to and approved in writing by the local planning authority which shall include the following details:

Survey work required to inform the risk assessment

Risk assessment of construction activities which are potentially damaging to biodiversity

b) Identification of "biodiversity protection zones".
c) Method statements including physical measures and sensitive working practices to avoid or reduce impacts during construction
d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists will be present on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) The position and specification of protective fences, exclusion barriers and warning signs.

The approved Biodiversity Construction Management Plan shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

REASON: In order to protect the biodiversity during construction and to comply with policy EN2 of the Adopted Area Action Plan and CN18 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

5 No development, ground works or vegetation clearance within each phase of development hereby approved shall commence until a **Habitat Management Plan (HMP)** has been submitted to and approved in writing by the local planning authority.

The HMP shall address mitigation, compensation, enhancement and restoration measures and shall include the following details:

a) Purpose and conservation objectives for the proposed works.
b) Review of site potential and constraints.
c) Detailed design(s) and/or working method(s) to achieve stated objectives.
d) Extent and location/area of proposed works on appropriate scaled maps and plans.
e) Type and source of materials to be used for all ecological mitigation and enhancement features, e.g. native species of local provenance.
f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.

The HMP shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

REASON: In order to protect the biodiversity present on site and its surroundings during construction and to comply with policy EN2 of the Adopted Area Action Plan and CN18 of

the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

Construction Conditions

6 Prior to occupation of the first phase of development hereby approved a Landscape and Ecological Management Plan (LEMP) must be submitted to, and be approved in writing by, the Local Planning Authority. The LEMP shall include details of the legal and funding mechanism(s) by which the long-term implementation of the IAMP ONE plan for the entire site will be secured by the developer with the management body(ies) responsible for its delivery together with the following:

a) Description and evaluation of features to be managed
b) Ecological trends and constraints on site that might influence management
c) Aims and objectives of management
d) Appropriate management options for achieving aims and objectives
e) Prescriptions for management actions inclusive
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over the life time of the development)
g) Details of the body or organization responsible for implementation of the plan
h) Ongoing monitoring and remedial measures

The LEMP shall also set out *(where the results from monitoring show that conservation aims and objectives of the LEMP are not being met)* how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved LEMP shall be implemented in full accordance with the approved details.

REASON: In order to protect and enhance the biodiversity of the site and its surroundings and to comply with Adopted Area Action plan policies EN2 and EN3 and CN16, CN18, CN21 and CN22 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

7 If construction works cease or are suspended on any phase of development hereby approved for a period of more than 24 months then the approved measures secured through Condition 3 shall be reviewed, and where necessary, amended and updated, The review shall be informed by further ecological surveys commissioned to:

a) establish if there have been any changes in the presence and/or abundance of prior species and habitats
b) identify any likely new ecological impacts that might arise from any changes

Where survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures shall be revised and new or amended measures, and a timetable for their implementation, shall be submitted to and approved in writing by the Local Planning Authority prior to the recommencement of development. Works will then be carried out in accordance with the new approved ecological measures and timetable.

REASON: In order to review the suitability of the ecological mitigation given the likely duration of development, to protect and enhance the biodiversity of the site areas and to comply with Adopted Area Action Plan EN2 policies and CN16, CN18, CN21 and CN22 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy

Framework

8 No development shall commence until a **Construction Environmental Management**

i **Plan** (CEMP) has been submitted to and approved in writing by the Local Planning Authority.The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

1. An updated detailed assessment of noise and vibration impacts on sensitive receptors specific to construction methods and practices, in accordance with BS 5528, and the resulting impact levels and the receptor locations identified in Section E1.2 of Chapter E of the submitted Environmental Statement.
2. Demonstration that the resulting noise impact levels are compliant with the threshold limits contained in Table E9 of Chapter E of the submitted Environmental Statement.
3. Where the threshold limits contained in Table E9 of Chapter E of the submitted Environmental Statement cannot be achieved, identification of necessary mitigation measures required to achieve these limits at the identified receptor locations.
4. Details of compliance monitoring, including monitoring locations and durations
5. Procedures for maintaining good public relations including complaint management, public consultation and liaison, arrangements for liaison with the Council's Public Protection and Regulatory Services Team;
5. Hours of construction, including deliveries;
6. Control measures for dust and other air-borne pollutants (where a separate Dust Management Plan is not provided); The control measures shall, as a minimum, incorporate the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement.
7. Siting and set up/establishment of site compound area;
8. Measures for controlling the use of site lighting whether required for safe working or for security purposes;
9. Operation, loading and unloading of plant and materials;
10. Storage of plant and materials used in constructing the development;
11. Wheel washing facilities;
12. Parking of vehicles of site operatives, delivery vehicles and visitors

Reason - To avoid nuisance to the occupiers of adjacent properties and to minimise harm to human health, controlled waters and ecology during the construction phases of the development, in accordance with the NPPF, Policy EN4 of the IAMP AAP and Policies EN1 and EN5 of the UDP, as well as Appendix D3 of Chapter D (Air Quality),Section E6.1 of Chapter E (Noise and Vibration), Section G6.1 of Chapter G (Cultural Heritage), Section H6 of Chapter H (Waste), Section J6.1 of Chapter J (Geology, Soil & Contaminated Land), Section K6.1.1 of Chapter K (Ecology and Biodiversity) and Section L5.3 of Chapter L (Access and Transport) of the IAMP ONE Environmental Statemen9

9 No development shall commence until a **Construction Traffic Management Plan** has been submitted to and approved in writing by the Local Planning Authority in liaison with Highways England. Thereafter development shall take place in accordance with the approved details.

- Routing of movements including details of any abnormal loads;
- Contractor parking and site compound arrangements;
- Measures to prevent debris being displaced onto the highway;
- Details of any temporary highway / rights of way closures and alternative routes;

- Temporary traffic management and site access control measures; and
- Site security and contract details.

Reason: In the interest of maintaining the Strategic Road Network operation and safety and to avoid nuisance to the occupiers of adjacent properties during the construction phases and in the interests of highway safety, in accordance with the NPPF, Policies T1 and EN1 of the IAMP AAP, Policy EN5 of the UDP and Section L5.3 of Chapter L (Access and Transport) of the IAMP ONE Environmental Statement.

10 No development shall commence within any Development Plot or in the Public Realm Area until details of the existing and proposed **Site Levels** have been submitted to and approved in writing by the Local Planning Authority for that Development Plot or the Public Realm. Thereafter the development shall be implemented in accordance with the approved site levels.

Reason: To ensure an appropriate form of development in the interest of good design and to accord with the NPPF, Policies D1, EN1 and EN4 of the IAMP AAP and Policy B2 of the UDP.

11 No development shall commence until a scheme to monitor traffic follows on the A1290 Downhill Lane northern junction has been agreed with the Local Highway Authority. Prior to the occupation of any unit, a scheme of highway improvement works to the A1290 Downhill Lane northern junction, including a phasing plan to secure the completion of highway improvements works on the site, shall be submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure highway safety and monitor queue lengths which could occur from the development in the interest of highway and to comply with policy T14 of the adopted Unitary Development Plan

12 No excavation or movement of soil should take place within any Development Plot or in the Public Realm Area until a **Soil Handling Strategy** has been submitted to and approved in writing by the Local Planning Authority for that Development Plot or the Public Realm (as defined on drawing number xx parameter plan), including details of the volume of soil to be moved and whether the soil will be stored on-site or transported off-site. Thereafter, development should take place in accordance with the approved details.

Reason: To ensure an appropriate form of development, in accordance with the NPPF.

13 No development shall commence until a **Phase 2 Site Investigation and Risk Assessment**, which includes a Conceptual Site Model and contaminated land risk assessment, has been submitted to and approved in writing by the Local Planning Authority. A written report of the findings of the investigation and risk assessment must be provided to the Local Planning Authority.

Reason: To ensure that risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EN14 of the UDP.

14 No development shall commence within any Development Plot or in the Public Realm Area

until a detailed **Remediation Scheme** to bring that specific area of the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historic environment has been submitted to and approved in writing by the Local Planning Authority, if required. The Remediation Scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The Remediation Scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Once the Remediation Scheme has been approved in writing by the Local Planning Authority it shall be known as the Approved Remediation Scheme. The Approved Remediation Scheme shall be implemented in accordance with its terms. The Local Planning Authority must be given one weeks notification of the commencement of the Approved Remediation Scheme works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy E14 of the UDP.

15 If during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved. To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks and in accordance with policy EN14 of the Unitary Development Plan.

16 No development shall commence until full details of a scheme of highway improvements to

widen the A1290 is submitted and approved by the Local Planning Authority in liaison with the Local Highway Authority and Highways England.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre-Commencement in any Development Plot Conditions

17 No development (excluding site investigations and site preparation works such as soil moving) shall commence in any Development Plot (as shown on drawing number xx parameter plan) until details of the layout, scale, appearance and landscaping (hereinafter called the '**reserved matters'**) have been submitted to and approved in writing by the Local Planning Authority for that Development Plot. Thereafter the development shall be implemented in accordance with the approved details.

Reason: To ensure a satisfactory development and in accordance with Section 5(1) of The Town and Country Planning (Development Management Procedure) (England) Order 2015

18 Applications for approval of the **reserved matters** shall be made to the Local Planning Authority within 5 years of the date of this permission. The development to which this permission relates shall be begun not later than two years from the approval of the final reserved matters.

Reason: To ensure that the development is commenced within a reasonable period of time from the date of this permission.

19 For each development plot a drainage strategy should be provided with reference to the submitted FRA and drainage strategy. The drainage strategy or submission for reserved matters should include for submission of construction drainage plans prior to each plot development including any temporary drainage.

Reason To ensure that proposed design can be constructed as planned and that flood risk and water quality are managed in line with paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

Pre-Occupation Conditions

20 No building shall be brought into use until a **Noise Assessment** has been submitted to and approved in writing by the Local Planning Authority which considers the specific noise sources proposed within that building or forming external plant associated with that building and provides details of any mitigation measures. Thereafter, the development shall be implemented in accordance with the approved details prior to the first occupation of that building.

Reason: In the interest of the amenity of adjacent properties and to accord with the NPPF, Policy EN5 of the UDP and Section E6.2 of Chapter E (Noise) of the IAMP ONE Environmental Statement.

21 No building shall be brought into use within any part of the site until a **Verification Report** demonstrating completion of the works set out in the Approved Remediation Scheme for that specific area of the site and the effectiveness of the remediation has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. If required, it shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy E14 of the UDP.

Pre occupation

22 No development shall be brought into use until the scheme of highway improvements to provide improved footway and cycleway infrastructure connectivity along the A1290 has been completed to the satisfaction of the Local Highway Authority and Highways England.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T2, T3 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

23 No development shall be brought into use until the proposed bus stop infrastructure improvements, and proposed footway / cycleway links have been completed to the satisfaction of the Local Highway Authority

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1, T3 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

24 No building shall be occupied within any part of the site until a Highways Operational Management Plan covering any Use Class B1(c), B2 and B8 operations has been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The Highways Operational Management Plan shall include but not be limited to the shift change times associated with all Use Class B1(c), B2 and B8 operations. The shift change times for occupiers within the IAMP One development will need to be off-set by at least one hour from those used at Nissan in the morning and afternoon periods. The shift change time restriction will apply to all Use Class B1(c), B2 and B8 operations for a temporary period until the improvement works to the A19 at Testo's and Downhill Lane are completed and operational.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1 of the Adopted Area Action Plan , T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

25 No development shall be brought into use until a Framework Travel Plan (FTP) has been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The FTP shall include:

i. details of appointment of a Travel Plan Coordinator for the full IAMP ONE development;

ii. an undertaking of an initial baseline travel survey within six months of occupation of each building, with a full Travel Plan adopted within 12 months of occupation, to submitted and agreed subject to the satisfaction of the Local Highway Authority;

iii. a scheme for the provision of cycle parking facilities for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the cycle parking facilities shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority; and

iv. a scheme for the provision of electric vehicle charging point infrastructure for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the electric vehicle charging points shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1 of the Adopted Area Action Plan ,T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

26 No building shall be brought into use until details of site operations and associated activities are submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority. Details shall refer to the submitted:

i. Delivery and Servicing Strategy; and

ii. Car Parking Strategy

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1, T4 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

27 No building shall be brought into use until details of the provision of refuse and recycling storage for that building has been submitted to and approved in writing by the Local Planning Authority. Thereafter the refuse and recycling facilities shall be available for use prior to the first occupation of that building.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies Del1 B of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre-occupation

28 No building shall be brought into use until initial details of a Public Transport Strategy are submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T3 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

29 No building shall be occupied until a scheme for the provision of an **external lighting** scheme for the external areas associated with that building including details of the number, type, position, design, dimensions and lighting levels of the lighting has been submitted to and approved in writing by the Local Planning Authority for that Phase. Thereafter, the lighting scheme shall be implemented in accordance with the approved details.

Reason: To ensure an appropriate form of development in the interest of good design, residential amenity and ecology to accord with the NPPF and Policies D2, EN1, EN2 and EN4 of the IAMP AAP.

30 No building shall be brought into use until a **SuDS Management and Maintenance Plan** for any SuDS scheme associated with that building has been submitted to and approved in writing by the Local Planning Authority, which includes details of the following:

i A description of the SUDS scheme, how it works and a general explanation of how it should be managed in the future;

ii A Schedule of Work to set out the tasks required to maintain the SuDS and the frequency necessary to achieve an acceptable standard of work. A spillage control procedure should also be included; and

iii A site plan (drawing) - showing maintenance areas, access routes, inlets, outlets and control structure positions, location of any other chambers, gratings, overflows and exceedance routes.

Reason: To ensure that all elements of the SuDS are maintained satisfactory, in accordance with the NPPF, Policy IN2 of the IAMP AAP and Policy EN12 of the UDP.

31 Prior to the commencement of the erection of any permanent **means of enclosure**, details of the enclosure shall be submitted to and agreed in writing by the Local Planning Authority. Thereafter, the means of enclose shall be erected in accordance with the approved details prior to the first occupation of the building within the plot to which the means of enclosure relates.

Reason: In the interests of the visual amenities of the locality, in accordance with the NPPF and Policy B2 of the UDP.

32 No building shall be brought into use until a **Hazards Operational Management Plan** detailing the maintenance and monitoring regimes that will be employed at each build to reduce the risk of the hazards identified in Table N4 of Chapter N (Risks and Accidents) of the Environmental Statement has been submitted to and agreed in writing by the Local Planning Authority. Thereafter the Plan shall be implemented in accordance with the approved details.

Reason: In accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Section N5.0 of Chapter N (Risks & Accidents) of the IAMP ONE Environmental Statement.

33 No building shall be brought into use until an **Emergency Response and Preparedness Plan** detailing how each business will prepared for and respond to the hazards identified in Table N4 of Chapter N (Risks and Accidents) of the Environmental Statement has been submitted to and agreed in writing by the Local Planning Authority. Thereafter the Plan shall be implemented in accordance with the approved details.

Reason: In accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Section N5.0 of Chapter N (Risks & Accidents) of the IAMP ONE Environmental Statement.

34 No building shall be brought into use until a **Site Waste Management Plan** (SWMP) covering the management of waste during the operation of that building has been submitted to and approved in writing by the Local Planning Authority. The SWMP will be prepared in accordance with the details provided within Section H6 of Chapter H: Waste of the IAMP ONE Environmental Statement (January 2018).

Reason: To ensure waste is appropriately reused, recycled or disposed of in accordance with the NPPF and Section H6.2 of Chapter H (Waste) of the IAMP ONE Environmental Statement.

Other Timescales

35 No **soft landscaping** works shall commence in the Public Realm Area until full details of the soft landscaping have been submitted to and approved in writing by the Local Planning Authority for this area. This will consist of a detailed planting plan and specification of works indicating soil depths, plant species, numbers, densities, locations inter relationship of plants, stock size and type, grass, and planting methods including construction techniques for pits in hard surfacing and root barriers. All works shall be in accordance with the approved plans. All existing or proposed utility services that may influence proposed tree planting shall be indicated on the planting plan. The scheme shall be completed to the satisfaction of the Local Planning Authority in accordance with a timetable of works that is submitted to and approved in writing by the Local Planning Authority within 12 months of the commencement of development within the Public Realm Area.

Reason: To ensure a high quality planting scheme is provided in the interests of visual amenity which contributes positively to local character and enhances biodiversity, in accordance with the NPPF and Policies EN1, EN2 and EN3 of the IAMP AAP.

36 Within the Development Plots and Public Realm Areas, any **new planting** within a period of 5 years from the date of completion of that planting that is dying, damaged, diseased or in the opinion of the LPA is failing to thrive shall be replaced by the same species of a size at least

equal to that of the adjacent successful planting in the next planting season unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure satisfactory landscaping to improve the appearance of the site in the interests of visual amenity, in accordance with the NPPF and Policies EN1, EN2 and EN3 of the IAMP AAP.

37 In the event that **ground contamination or sub-surface mining features** are discovered at any time when carrying out the approved development that was not previously identified it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be carried out and where remediation is necessary a remediation scheme must be prepared which is submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved mediation scheme a verification report must be prepared, which should be submitted to and approve in writing by the Local Planning Authority.

Reason: To ensure that risks from unexpected land contamination to human health, controlled waters and ecology are minimised and to ensure that the development can be carried out safely without unacceptable risks to these receptors, in accordance with the NPPF, Policy EN4 of the IAMP AAP and Section J6.1 of Chapter J (Geology, Soil & Contaminated Land) of the IAMP ONE Environmental Statement.

38 Not to occupy more than 3 units prior to the submission to the local planning authority of a report assessing the feasibility of a demand-led bus service for workers at the development. The report shall be prepared in consultation with Nexus and at least two transport providers. The report shall address the following:

- Existing commercial models of demand-led employee bus services (with case study)
- Level of demand from current employees at IAMP ONE required to make a pilot service viable to be assessed, with the assessment to be repeated at the time of occupation of each further unit, to be discontinued as and when a viable demand-led bus service has been established
- (If viable) proposals for implementing a pilot service to include: timing, duration, scope funding and geographical coverage of such a pilot service
- (if viable) criteria for monitoring and evaluating such a pilot service
- Methodology to establish whether to (a) extend the pilot service, (b) transition from pilot service to either a permanent demand-led employee bus service or a local bus service (in each case with provision for future review) or (c) cease to operate the pilot service

The recommendations of the report shall be implemented as approved by the planning authority.
Reason : In order to provide a satisfactory from of public transport to comply with policies S1 and T3 of the IAMP Adopted Area Action Plan

Conditions to be complied with (but requiring no submission)

39 The development hereby permitted shall not be carried out other than in accordance with the **approved plans** as listed below:

- [the approved drawings (site location plan, parameter plans, highway and drainage drawings)

Reason: This condition is imposed pursuant to article 4 (1) of the Town and Country Planning (General Development Procedure) Order 2015 (as amended) to ensure development is carried out in accordance with the approved details as submitted.

40 The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) **Flood Risk Assessment & Drainage Strategy** Ref IAMP_ONE-SYS001 16/03/2018 an Non-Technical Statement dated 09/04/2018 and the following mitigation measures detailed within the FRA:

- Provision of compensatory flood storage attenuation ponds A, B and C must be designed and maintained in accordance with FRA and Drainage Strategy Ref:
- IAMP_ONE-SYS001 dated 09/04/2018 and Non-Technical Statement dated 16/03/2018 and layout and detail drawings IAMP_ONE-SYS-HDG-Z-DR-05-023-SO/A1/PO1, IAMP_ONE-SYS-HDG-Z-DR-05-024-SO/A1/PO1, IAMP_ONE-SYS-HDG-Z-DR-05-025-SO/A1/PO1 and IAMP_ONE-SYS-HDG-Z-DR-05-026-SO/A1/PO1.

surface water construction details IAMP_ONE-SYS-HDG-Z-DR-D-05-013-S0

Reason: To prevent the increased risk of flooding, both on and off site for the lifetime of the development as defined in paragraph 102 and 103 of the NPPF and comply with policies S1, EN2, Del1, Del2 and IN2 of the IAMP Adopted Area Action Plan.

41 **Any site operations and activities associated with the periods for construction** (excluding deliveries) shall only be carried out between 0700 hours and 18:00 hours on Mondays to Fridays and only between 0800 hours and 1700 hours on Saturdays, with no construction related operations and activities taking place on Sundays, Bank Holidays or Public Holidays.

Reason: To safeguard the amenities of nearby residents in accordance with the NPPF, Policy EN4 of the IAMP AAP, Policy EN5 of the UDP and Chapter E: Noise of the IAMP ONE Environmental Statement.

42 Any **deliveries** associated with the periods of construction shall only take place between 0800 hours and 1430 hours on Mondays to Saturdays, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To safeguard the amenities of nearby residents and to reduce the impact on the highway network in accordance with the NPPF, Policies EN4 and T1 of the IAMP AAP, Policy EN5 of the UDP and the Outline Construction Traffic Management Plan.

43 Notwithstanding the provisions of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any Order revoking and/or re-enacting that Order) the **Principal Uses** hereby approved shall only be used for the purposes specified in the application [and in policy S2 of the IAMP AAP] (being use classes B1(c), B2 and B8 as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any Order revoking and/or re-enacting that Order).

Reason: To ensure that the primary function of the site is for production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, and related supporting uses in accordance with Policy S2 of the IAMP AAP.

Pre-Commencement of Surface Water Drain, East and South of A1290

44 No ground works or development shall commence on the surface water drain, east and south of the A1290, until the developer has appointed an archaeologist to undertake a **programme of archaeological work set** to be agreed with the Local Planning Authority. Before development commences on the surface water drain, the route of the drain shall be topsoil stripped by the appointed archaeologist in order that any archaeological remains can be recorded and where necessary, archaeologically excavated. The appointed archaeologist shall then be present at relevant times during the undertaking of the developer's groundworks with a programme of visits to be agreed in writing by the Local Planning Authority prior to groundworks commencing.

45 Within six months of the completion of the **archaeological work**, the report of the results of archaeological work pursuant to condition xx shall be submitted to and approved in writing by the Local Planning Authority.

Reason: The site is located within an area identified as being of potential archaeologist interest. The observation is required to ensure that any archaeological remains on the site can be preserved wherever possible and recorded, and, if necessary, emergency salvage undertaken in accordance with paragraph 141 of the NPPF, Policies B11, B13 and B14 of the UDP, Draft Core Strategy Policies E4 and E5 and Section G6.1 of Chapter G (Cultural Heritage) of the IAMP ONE Environmental Statement.

Pre-Commencement Excluding Site Investigations and Site Preparation Work

46

No development (excluding site investigations and site preparation works such as soil moving) shall commence within any Development Plot until a **foul and surface water drainage scheme**, including a detailed assessment and a timetable for implementation, has been submitted to and approved in writing by the Local Planning Authority for that Development Plot. Thereafter, the foul and surface water drainage scheme shall be implemented in accordance with the approved details.

Reason: To prevent the increased risk of flooding in accordance with the NPPF, Policy IN2 of the IAMP AAP and Policy EN12 of the UDP.

Conditions to be complied with

47 The development hereby approved shall not provide more than **134,984sqm gross internal 137,933sqm gross external floor space** (excluding the building within Plot 3 for which full details have been submitted).

Reason – In order to control the total amount of floorspace within the outline part of the development, in accordance with Policy S3 of the IAMP AAP.

48 Development shall take place in accordance with the **principles of the Design and Access Statement** prepared by AJA Architects (16 January 2018) and the draft Design Code (January 2018).

Reason: In the interest of good design and to ensure a comprehensive and co-ordinated approach to the development to accord with the aims and objectives of the NPPF and Policies S1 and Del1 of the IAMP AAP.

Conditions Applicable to Plot 3 Only

Highways Full Application

Pre occupation

49 No development shall be brought into use until the scheme of highway improvements to widen a section of the A1290 has been completed to the satisfaction of the Local Highway Authority and Highways England.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1 of the adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre occupation

50 No development shall be brought into use until the proposed bus stop infrastructure improvements, and proposed footway / cycleway links have been completed to the satisfaction of the Local Highway Authority

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T3 of the Adopted Area Action Plan,T14 and T22 of the adopted Unitary Development Plan

and paragraph 32 of the National Planning Policy Framework

Pre occupation

51 No development shall be brought into use until a detailed **Highway Operation Management Plan h**as been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The Highway Operational Management Plan shall include full details of shift working patterns to be implemented and be based on highway network requirements for both the strategic road network and the local road network.

52 No development shall commence until full details of the programme for delivery of the new spine road is submitted and approved by the Local Planning Authority in liaison with the Local Highway Authority.

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1 of the Adopted Area Action Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

53 No development shall be brought into use until details of full **Travel Plans** relating to specific plots and end occupiers have been submitted to and approved in writing by the Local Planning Authority in liaison with the Local Highway Authority and Highways England. The full Travel Plans will need to form part of an overarching Framework Travel Plan for IAMP ONE. Details shall include:

i. an undertaking of an initial baseline travel survey within six months of occupation of each building, with a full Travel Plan adopted within 12 months of occupation, to submitted and agreed subject to the satisfaction of the Local Highway Authority;

ii. a scheme for the provision of cycle parking facilities for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the cycle parking facilities shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority; and

iii. a scheme for the provision of electric vehicle charging point infrastructure for the development has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the electric vehicle charging points shall be implemented in accordance with the approved details and shall be available for use and be subject to the satisfaction of the Local Highway Authority

Reason: To ensure that requirements are met for both the strategic road network and the local road network to meet the needs of the development. In the interests of highway safety and highway capacity requirements and to comply with policies T1, T4 of the Adopted Unitary Development Plan, T14 and T22 of the adopted Unitary Development Plan and paragraph 32 of the National Planning Policy Framework

Pre-Commencement Conditions

54 No development shall commence until a scheme for **the long-term management of the attenuation ponds A, B and C** has been agreed in accordance with the requirements of Condition 1.

Reason: To prevent the increase risk of flooding, both on and off site for the lifetime of the development as defined in paragraph 102 and 103 of the National Planning Policy Framework.

55 No development shall commence until a plan detailing any temporary or construction drainage of surface water from Plot 3 is provided. This will include a construction management report for management of specific issues relating to sediment and other pollutants and how they will be managed on the site..

Reason: To ensure protection from flood risk and the protection of Hylton Dene Burn are managed in line with paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

Pre Commencement Conditions

56 No development, ground works or vegetation clearance within each phase of development hereby approved shall commence until a **Biodiversity Construction Management Plan** inclusive of scaled plans for IAMP ONE has been submitted to and approved in writing by the local planning authority which shall include the following details:

Survey work required to inform the risk assessments

Risk assessment of construction activities which are potentially damaging to biodiversity

b) Identification of "biodiversity protection zones".
c) Method statements including physical measures and sensitive working practices to avoid or reduce impacts during construction
d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists will be present on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) The position and specification of protective fences, exclusion barriers and warning signs.

The approved Biodiversity Construction Management Plan shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

REASON: In order to protect the biodiversity during construction and to comply with policy EN2 of the Adopted Area Action Plan and CN18 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

57 No development, ground works or vegetation clearance within each phase of development hereby approved shall commence until a **Habitat Management Plan (HMP)** has been submitted to and approved in writing by the local planning authority.
The HMP shall address mitigation, compensation, enhancement and restoration measures and shall include the following details:

g) Purpose and conservation objectives for the proposed works.
h) Review of site potential and constraints.
i) Detailed design(s) and/or working method(s) to achieve stated objectives.
j) Extent and location/area of proposed works on appropriate scaled maps and plans.
k) Type and source of materials to be used for all ecological mitigation and enhancement features, e.g. native species of local provenance.
l) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.

The HMP shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

REASON: In order to protect the biodiversity present on site and its surroundings during construction and to comply with policy EN2 of the Adopted Area Action Plan and CN18 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

Ecology Construction Conditions

58 Prior to occupation of the first phase of development hereby approved a Landscape and Ecological Management Plan (LEMP) must be submitted to, and be approved in writing by, the Local Planning Authority. The LEMP shall include details of the legal and funding mechanism(s) by which the long-term implementation of the IAMP ONE plan for the entire site will be secured by the developer with the management body(ies) responsible for its delivery together with the following:

a) Description and evaluation of features to be managed
b) Ecological trends and constraints on site that might influence management
c) Aims and objectives of management
d) Appropriate management options for achieving aims and objectives
e) Prescriptions for management actions inclusive
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over the life time of the development)
g) Details of the body or organization responsible for implementation of the plan
h) Ongoing monitoring and remedial measures

The LEMP shall also set out *(where the results from monitoring show that conservation aims and objectives of the LEMP are not being met)* how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved LEMP shall be implemented in full accordance with the approved details.

REASON: In order to protect and enhance the biodiversity of the site and its surroundings and to comply with Adopted Area Action plan policies EN2 and EN3 and CN16, CN18, CN21 and CN22 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

59 If construction works cease or are suspended on any phase of development hereby approved for a period of more than 24 months then the approved measures secured through Condition 3 shall be reviewed, and where necessary, amended and updated.., The review shall be informed by further ecological surveys commissioned to:

c) establish if there have been any changes in the presence and/or abundance of prior species and habitats
d) identify any likely new ecological impacts that might arise from any changes

Where survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures shall be revised and new or amended measures, and a timetable for their implementation, shall be submitted to and approved in writing by the Local Planning Authority prior to the recommencement of development. Works will then be carried out in accordance with the new approved ecological measures and timetable.

REASON: In order to review the suitability of the ecological mitigation given the likely duration of development, to protect and enhance the biodiversity of the site areas and to comply with Adopted Area Action Plan EN2 policies and CN16, CN18, CN21 and CN22 of the adopted Unitary Development Plan and paragraph 109 of the National Planning Policy Framework.

60 No development shall commence until a **Construction Environmental Management Plan** (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The plan must demonstrate the adoption and use of the best practicable means to reduce the effects of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

1. An updated detailed assessment of noise and vibration impacts on sensitive receptors specific to construction methods and practices, in accordance with BS 5528, and the resulting impact levels and the receptor locations identified in Section E1.2 of Chapter E of the submitted Environmental Statement.
2. Demonstration that the resulting noise impact levels are compliant with the threshold limits contained in Table E9 os Chapter E of the submitted Environmental Statement.
3. Where the threshold limits contained in Table E9 of Chapter E of the submitted Environmental Statement cannot be achieved, identification of necessary mitigation measures required to achieve these limits at the identified receptor locations.
4. Details of compliance monitoring, including monitoring locations and durations
5. Procedures for maintaining good public relations including complaint management, public consultation and liaison, arrangements for liaison with the Council's Public Protection and Regulatory Services Team;
5. Hours of construction, including deliveries;
6. Control measures for dust and other air-borne pollutants (where a separate Dust Management Plan is not provided); The control measures shall, as a minimum, incorporate the mitigation measures listed in Table 9 in Appendix D1 of the Environmental Statement.
7. Siting and set up/establishment of site compound area;
8. Measures for controlling the use of site lighting whether required for safe working or for security purposes;
9. Operation, loading and unloading of plant and materials;
10. Storage of plant and materials used in constructing the development;
11. Wheel washing facilities;
12. Parking of vehicles of site operatives, delivery vehicles and visitors

Reason - To avoid nuisance to the occupiers of adjacent properties and to minimise harm to human health, controlled waters and ecology during the construction phases of the development, in accordance with the NPPF, Policy EN4 of the IAMP AAP and Policies EN1 and EN5 of the UDP, as well as Appendix D3 of Chapter D (Air Quality),Section E6.1 of Chapter E (Noise and Vibration), Section G6.1 of Chapter G (Cultural Heritage), Section H6 of Chapter H (Waste), Section J6.1 of Chapter J (Geology, Soil & Contaminated Land), Section K6.1.1 of Chapter K (Ecology and Biodiversity) and Section L5.3 of Chapter L (Access and Transport) of the IAMP ONE Environmental Statement.

61 No development shall commence until a **Construction Traffic Management Plan** has been submitted to and approved in writing by the Local Planning Authority in liaison with Highways England. Thereafter development shall take place in accordance with the approved details.

- Routing of movements including details of any abnormal loads;
- Contractor parking and site compound arrangements;
- Measures to prevent debris being displaced onto the highway;

- Details of any temporary highway / rights of way closures and alternative routes;
- Temporary traffic management and site access control measures; and
- Site security and contractor details.

Reason: In the interest of maintaining the Strategic Road Network operation and safety and to avoid nuisance to the occupiers of adjacent properties during the construction phases and in the interests of highway safety, in accordance with the NPPF, Policies T1 and EN1 of the IAMP AAP, Policy EN5 of the UDP and Section L5.3 of Chapter L (Access and Transport) of the IAMP ONE Environmental Statement.

62 No development shall commence within any Development Plot or in the Public Realm Area until details of the existing and proposed **Site Levels** have been submitted to and approved in writing by the Local Planning Authority for that Development Plot or the Public Realm. Thereafter the development shall be implemented in accordance with the approved site levels.

Reason: To ensure an appropriate form of development in the interest of good design and to accord with the NPPF, Policies D1, EN1 and EN4 of the IAMP AAP and Policy B2 of the UDP.

63 No excavation or movement of soil should take place within any Development Plot or in the Public Realm Area until a **Soil Handling Strategy** has been submitted to and approved in writing by the Local Planning Authority for that Development Plot or the Public Realm (as defined on drawing number TBC), including details of the volume of soil to be moved and whether the soil will be stored on-site or transported off-site. Thereafter, development should take place in accordance with the approved details.

Reason: To ensure an appropriate form of development, in accordance with the NPPF.

64 No development shall commence until a **Phase 2 Site Investigation and Risk Assessment**, which includes a Conceptual Site Model and contaminated land risk assessment, has been submitted to and approved in writing by the Local Planning Authority. A written report of the findings of the investigation and risk assessment must be provided to the Local Planning Authority.

Reason: To ensure that risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EN14 of the UDP.

65 No development shall commence within any Development Plot or in the Public Realm Area until a detailed **Remediation Scheme** to bring that specific area of the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historic environment has been submitted to and approved in writing by the Local Planning Authority, if required. The Remediation Scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The Remediation Scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Once the Remediation Scheme has been approved in writing by the Local Planning Authority it shall be known as the Approved Remediation Scheme. The Approved Remediation Scheme shall be

implemented in accordance with its terms. The Local Planning Authority must be given one weeks notification of the commencement of the Approved Remediation Scheme works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy E14 of the UDP.

66 Full details of source control on plot 3 are to be provided in line with the submitted drawings. This may include updated sections and plans.

Reason: To support submitted planning documents to show that flood risk is managed as defined in paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan and that flow control and water quality mitigation is provided for any discharges to Hylton Dene Burn

67 An updated drainage drawing for Plot 3 should be submitted to detail and aquatic bench and planting for the SUDS pond as required by best practice guidance CIRIA c753

Reason: To ensure the proposed drainage ponds operate with regard to water quality and flood risk in accordance with paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

Pre-Occupation Conditions

68 No building shall be brought into use until a **Noise Assessment** has been submitted to and approved in writing by the Local Planning Authority which considers the specific noise sources proposed within that building or forming external plant associated with that building and provides details of any mitigation measures. Thereafter, the development shall be implemented in accordance with the approved details prior to the first occupation of that building.

Reason: In the interest of the amenity of adjacent properties and to accord with the NPPF, Policy EN5 of the UDP and Section E6.2 of Chapter E (Noise) of the IAMP ONE Environmental Statement.

69 No building shall be brought into use within any part of the site until a **Verification Report** demonstrating completion of the works set out in the Approved Remediation Scheme for that specific area of the site and the effectiveness of the remediation has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. If required, it shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy E14 of the UDP.

70 No building shall be occupied until a scheme for the provision of an **external lighting** scheme for the external areas associated with that building including details of the number, type, position, design, dimensions and lighting levels of the lighting has been submitted to and approved in writing by the Local Planning Authority for that Phase. Thereafter, the lighting scheme shall be implemented in accordance with the approved details.

Reason: To ensure an appropriate form of development in the interest of good design, residential amenity and ecology to accord with the NPPF and Policies D2, EN1, EN2 and EN4 of the IAMP AAP.

71 No building shall be brought into use until a **SuDS Management and Maintenance Plan** for any SuDS scheme associated with that building has been submitted to and approved in writing by the Local Planning Authority, which includes details of the following:

a. A description of the SUDS scheme, how it works and a general explanation of how it should be managed in the future;

b. A Schedule of Work to set out the tasks required to maintain the SuDS and the frequency necessary to achieve an acceptable standard of work. A spillage control procedure should also be included; ce and

c. A site plan (drawing) - showing maintenance areas, access routes, inlets, outlets and control structure positions, location of any other chambers, gratings, overflows and exceedance routes.

Reason: To ensure that all elements of the SuDS are maintained satisfactory, in accordance with the NPPF, Policy IN2 of the IAMP AAP and Policy EN12 of the UDP.

72 Prior to the commencement of the erection of any permanent **means of enclosure**, details of the enclosure shall be submitted to and agreed in writing by the Local Planning Authority. Thereafter, the means of enclose shall be erected in accordance with the approved details prior to the first occupation of the building within the plot to which the means of enclosure relates.

Reason: In the interests of the visual amenities of the locality, in accordance with the NPPF and Policy B2 of the UDP.

73 No building shall be brought into use until a **Hazards Operational Management Plan** detailing the maintenance and monitoring regimes that will be employed at each build to reduce the risk of the hazards identified in Table N4 of Chapter N (Risks and Accidents) of the Environmental Statement has been submitted to and agreed in writing by the Local Planning Authority. Thereafter the Plan shall be implemented in accordance with the approved details.

Reason: In accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Section N5.0 of Chapter N (Risks & Accidents) of the IAMP ONE Environmental Statement.

74 No building shall be brought into use until an **Emergency Response and Preparedness Plan** detailing how each business will prepared for and respond to the hazards identified in Table N4 of Chapter N (Risks and Accidents) of the Environmental Statement has been submitted to and agreed in writing by the Local Planning Authority. Thereafter the Plan shall be implemented in accordance with the approved details.

Reason: In accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Section N5.0 of Chapter N (Risks & Accidents) of the IAMP ONE Environmental Statement.

75 No building shall be brought into use until a **Site Waste Management Plan** (SWMP) covering the management of waste during the operation of that building has been submitted to and approved in writing by the Local Planning Authority. The SWMP will be prepared in accordance with the details provided within Section H6 of Chapter H: Waste of the IAMP ONE Environmental Statement (January 2018).

Reason: To ensure waste is appropriately reused, recycled or disposed of in accordance with the NPPF and Section H6.2 of Chapter H (Waste) of the IAMP ONE Environmental Statement.

76 No **hard landscaping** works (excluding base course for access roads and car parking areas) shall commence until full details of proposed hard landscaping has been submitted to and approved in writing by the Local Planning Authority. This will include all external finishing materials, finished levels, and all construction details confirming materials, colours, finishes and fixings. Thereafter, the scheme shall be implemented in accordance with the approved details and shall be completed to the satisfaction of the Local Planning Authority within a period of 24 months from first occupation / use of the building.

Reason: To enable the LPA to control details of the proposed development, to ensure a high quality hard landscaping scheme is provided in the interests of visual amenity, in accordance with the NPPF and Policy D2 of the IAMP AAP.

77 No **soft landscaping** works shall commence until full details of soft landscaping have been submitted to and approved in writing by the Local Planning Authority. This will be a detailed planting plan and specification of works indicating soil depths, plant species, numbers, densities, locations inter relationship of plants, stock size and type, grass, and planting methods including construction techniques for pits in hard surfacing and root barriers. All works shall be in accordance with the approved plans. All existing or proposed utility services that may influence proposed tree planting shall be indicated on the planting plan. The scheme shall be completed to the satisfaction of the Local Planning Authority, unless otherwise agreed with the LPA in writing, within a period of 24 months from first occupation / use of the building.

Reason: To ensure a high quality planting scheme is provided in the interests of visual amenity which contributes positively to local character and enhances biodiversity, in accordance with the NPPF and Policies EN1, EN2 and EN3 of the IAMP AAP

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Pre-Construction of any Building

78 No construction work shall take place on a building beyond damp course level until a schedule and / or samples of materials, colours and finishes to be used on all external surfaces of that building (including walls, roofs, doors and windows) have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented in accordance with the approved details.

Reason: In the interest of visual amenity, in accordance with the NPPF and Policy B2 of the UDP.

Other Conditions

79 Within the Development Plots and Public Realm Areas, any **new planting** within a period of 5 years from the date of completion of that planting that is dying, damaged, diseased or in the opinion of the LPA is failing to thrive shall be replaced by the same species of a size at least equal to that of the adjacent successful planting in the next planting season unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure satisfactory landscaping to improve the appearance of the site in the interests of visual amenity, in accordance with the NPPF and Policies EN1, EN2 and EN3 of the IAMP AAP.

80

In the event that **ground contamination or sub-surface mining features** are discovered at any time when carrying out the approved development that was not previously identified it must be reported immediately to the Local Planning Authority. An investigation and risk assessment must be carried out and where remediation is necessary a remediation scheme must be prepared which is submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved mediation scheme a verification report must be prepared, which should be submitted to and approve in writing by the Local Planning Authority.

Reason: To ensure that risks from unexpected land contamination to human health, controlled waters and ecology are minimised and to ensure that the development can be carried out safely without unacceptable risks to these receptors, in accordance with the NPPF, Policy EN4 of the IAMP AAP and Section J6.1 of Chapter J (Geology, Soil & Contaminated Land) of the IAMP ONE Environmental Statement.

81 Final drainage drawings are to be submitted to detail locations and invert levels of the proposed drainage network above and below ground and connection stub point sizing and invert levels.

Reason: To ensure the development continues to operate with regard to flood risk and water quality and are managed in line with paragraph 102 and 103 of the National Planning Policy

Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

82 For the infrastructure drainage and for each subsequent plot developed there will be a submission to the local planning authority of an annual maintenance and inspection report in perpetuity reporting on the proposed drainage maintenance submitted for each part of the application for SUDS features and associated structures. This report should include any remedial work undertaken.

Reason: To ensure the development continues to operate with regard to flood risk and water quality and are managed in line with paragraph 102 and 103 of the National Planning Policy Framework and to comply with policies S1,EN2,Del1,Del2 and IN1 of the Adopted Area Action Plan.

Conditions to be complied with (but requiring no submission)

83 The development to which this permission relates shall be begun not later than the expiration of three years from the date of this decision.

Reason: As required by Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

84 The development hereby permitted shall not be carried out other than in accordance with the **approved plans** as listed below:

Landscape & Surface Finishes Plan	1405(S)02A2
Proposed Site Sections	1405(S)03A2
Existing Site Plan	1405(S)04A2
Proposed Plan – Production & Offices	1405(0)01A2
Proposed Elevations	1405(0)02A2
Proposed Roof Plan	1405(0)03A2
Proposed Plans & Elevations – Offices	1405(0)04A2
Gatehouse Plans & Elevations	1405(0)05A2
Condenser Compound Layout	1405(90)01A1
Proposed Site Layout	1405(S)01A2

Reason - This condition is imposed pursuant to article 4 (1) of the Town and Country Planning (General Development Procedure) Order 2015 (as amended) to ensure development is carried out in accordance with the approved details as submitted.

85 Development shall take place in accordance with the principles of the **Design and Access Statement** prepared by Ian Belsham Associates (Revision 3 dated 22 March 2018) and draft Design Code (January 2018).

Reason: In the interest of good design and to ensure a comprehensive and co-ordinated approach to the development to accord with the aims and objectives of the NPPF and Policies S1 and Del1 of the IAMP AAP.

86 Any site operations and activities associated with the periods for construction (excluding deliveries) shall only be carried out between 0700 hours and 18:00 hours on Mondays to Fridays and only between 0800 hours and 1700 hours on Saturdays, with no construction related operations and activities taking place on Sundays, Bank Holidays or Public Holidays.

Reason: To safeguard the amenities of nearby residents in accordance with the NPPF, Policy EN4 of the IAMP AAP, Policy EN5 of the UDP and Chapter E: Noise of the IAMP ONE Environmental Statement.

87 Any **deliveries** associated with the periods of construction shall only take place between 0800 hours and 1430 hours on Mondays to Saturdays.

Reason: To safeguard the amenities of nearby residents and to reduce the impact on the highway network in accordance with the NPPF, Policies EN4 and T1 of the IAMP AAP, Policy EN5 of the UDP and the Outline Construction Traffic Management Plan.

Please note that the planning condition numbers may vary on the final decision notice if members of the committee are minded to grant consent may, due to the application being a hybrid. The conditions have been layout out in the report in terms of pre commencement, pre-construction, prior occupation etc for easy of reference.

88 Notwithstanding the provisions of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any Order revoking and/or re-enacting that Order) the **Principal Uses** hereby approved shall only be used for the purposes specified in the application [and in policy S2 of the IAMP AAP] (being use classes B1(c), B2 and B8 as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any Order revoking and/or re-enacting that Order).

Reason: To ensure that the primary function of the site is for production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, and related supporting uses in accordance with Policy S2 of the IAMP AAP.

Appendix 1

Representation to Application