



SH/RH

24 April 2018

P McIntyre Esq
Executive Director, Economy and Place
Sunderland City Council
PO Box 102, Civic Centre
Sunderland, SR2 7DN

Dear Mr McIntyre

TOWN AND COUNTRY PLANNING ACT 1990 – HYBRID PLANNING APPLICATION FOR FULL AND OUTLINE PLANNING PERMISSION FOR LAND TO THE WEST OF THE A1290 AND NORTH OF NISSAN, WASHINGTON - PREPARED BY HENRY BOOT DEVELOPMENTS LIMITED (18/00092/HE4) – FORMAL OBJECTION

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*



Hedley Planning Services
Unit 3 Hexham Enterprise Park
Burn Lane, Hexham
Northumberland NE46 3HY
t: 0191 580 5101
e: enquiries@hedleyplanning.co.uk
w: hedleyplanning.co.uk

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. TEPF 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 TEPF and, therefore, we continue to maintain serious concerns object in the strongest terms upholding the objections previously supplied by TEPF.

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. TEPF 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 TEPF 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 TEPF 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. TEPF 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.

TEPF 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.

Yours faithfully



Sean Hedley BA (Hons) Dip TP MRTPI
Director
Mobile: 07725 834338
Email: sean@hedleyplanning.co.uk

Cc: A Watson Esq
P Razaq Esq, Town End Farm Partnership