

International Advanced Manufacturing Park Area Action Plan

Schedule of Representations

February 2017



IAMP AAP Publication Draft: Schedule of Representations, February 2017

In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, regulation 22 (v), this schedule summarises the 39 representations made pursuant to regulation 20.

This schedule should be considered alongside the Report of Representations (PSD8) which includes all 39 representations and the Schedule of Proposed Modifications (PSD6) which proposes a number of minor modifications to the International Advanced Manufacturing Park (IAMP AAP) Publication Draft (PSD1).

In total, there are 128 comments from 39 representations. Four respondents have subsequently withdrawn their submissions following agreed Statements of Common Ground (Gateshead Council, Newcastle City Council, Historic England and Sports England).

The purpose of this schedule is to identify the main issues raised by each respondent. The schedule includes;

- A unique reference number which correlates to representations in the Report of Representations (PSD8).
- Identifies whether the respondent considers the Plan to be Legally Compliant, Positively Prepared, Effective, Justified and Consistent with the National Planning Policy Framework (NPPF).
- The paragraph or the policy the representation relates to in both the Publication Draft AAP (PSD1) and the Publication Draft, which incorporates proposed modifications (PSD7).
- A verbatim of the representation submitted and a summary of any issues raised.
- Any modifications proposed by the party making the representation.
- The Councils' response to any issues raised and any modifications the Councils' propose to make a consequence of the representation. The proposed modification reference correlates to the Schedule of Proposed Modifications (PSD6).

Reference	Name/Organisation	Paragraph/Policy	Legally Compliant	Positively Prepared	Effective	Consistent with NPPF	Justified	Representation	Summary	Proposed Modification	Councils' Response	Councils' Proposed Modification
200916/BDWH/030/A	Barratt David Wilson Homes	AAP						Barratt David Wilson Homes support the IAMP and the opportunity it presents to growth the local and regional economy.	Barratt David Wilson Homes support IAMP	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/BDWH/030/B	Barratt David Wilson Homes	AAP						Barratt David Wilson Homes is concerned that the proposed IAMP does not fully consider this area of Sunderland spatially and consider the wider context. There is no consideration within the document for the wider context, which only considers immediate adjacent uses such as the interface with Nissan. The Masterplan Objectives (Section 4.4.1) appear to consider the site to be located in the countryside and an area of important green open space. However, Sunderland has already coalesced with Washington to the south via Nissan and the Enterprise Zone. The area is distinctly urban fringe immediately adjoining industrial uses, the A19 dual carriageway and in close proximity to the eastern edge of Washington and western edge of Sunderland. To the south of the site there is constant built form linking Washington to Sunderland in the form of industrial development. To the north in South Tyneside lie Boldon Business Park and Follingsby Park and the former Wardley Coal Disposal Point. This area is therefore encircled by development and being approximately 2 miles wide should not be considered countryside but an urban fringe location. Within considering this wider context the IAMP AAP should respect the potential of land adjoining its western boundaries could come forward for development in the future. We are concerned that defining such a rigid policy approach could inadvertently harm the prospect of land immediately adjoining the AAP boundary which could come forward for residential development in the Local Plan and add value to the area and assist in the delivery of the economic growth aspirations. This issue arises due to the consideration of a portion of this area in isolation for the IAMP ahead of the consideration of the wider area through the Local Plan. This disjointed approach can lead to confusion and the potential development land in the area. In such circumstances where a portion of the Development Plan is being progressed ahead of the remaining Local Plan evidence and policies should not be able to interpreted to apply to land beyond the AAP boundary.	The respondent considers that there is no consideration in the AAP for the wider context as it only considers immediately adjacent uses. The site is an open fringe location immediately adjoining industrial uses, not open countryside. The site is encircled by development. The AAP should respect the potential of land to come forward adjoining its western boundary in the future.	Amend AAP to be more reflective and respect that land outside of the AAP could come forward through the Local Plan and therefore remove element suggesting settlement breaks and integration within a countryside setting.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The purpose of the AAP is to prepare a policy framework within the AAP boundary. The AAP will remove land from the Green Belt required to meet the commercial needs for advanced manufacturing and automotive sectors. The Councils consider that they demonstrated exceptional circumstances (PSD12). The AAP does not limit the assessment of land outside the AAP boundary, therefore the Councils do not consider it necessary to amend the AAP boundary. This boundary incorporates the land required for development, mitigation and protection. The IAMP AAP forms part of the suite of development plans for Sunderland and South Tyneside's respective Local Plans. The current and future use of land outside of the IAMP AAP boundary is the subject of existing and emerging Development Plans for Sunderland and South Tyneside and any representations relating to uses outside the AAP should be made through review of those plans. The Boundary for the AAP reflects the area designated as a Nationally Significant Infrastructure Project, and in the absence of a National Policy Statement for Business and Commercial uses provides the policy framework for that area both in terms of development of land and mitigation of impacts.	No modification proposed

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260916/BDWH/030/E	Barratt David Wilson Homes	AAP						Barratt David Wilson Homes would like to highlight briefly the benefits of the Land East of Sulgrave Road, Washington (SHLAA Site 401 plus adjacent land) and that it should be identified for new housing. Full details have been submitted previously as part of the Growth Options consultation. We consider that a new sustainable urban extension could be created to the east of Washington. We believe the site to be a sustainable location for residential development which can assist in the delivery of a sustainable community providing housing in close proximity to existing and major new employment. We consider that the site is available, suitable and achievable and therefore in accordance with the Framework is deliverable and able to come forward in the short term. We are preparing a Masterplan and Vision which will be submitted in due course and demonstrate the deliverability of the proposals.	The respondent highlights the benefits of land East of Sulgrave Road, Washington and that it should be identified for housing in the emerging Sunderland Local Plan.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The representation relates to matters outside the AAP boundary.	No modification proposed
060916/COALAUTHORITY/015	Coal Authority	AAP						Having reviewed the document, I confirm that we have no specific comments to make at this stage.	No comments	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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260916/IAMPLLP/035/G	IAMP LLP	AAP	Y	Y	Y	Y		<p>We believe that the AAP meets the "soundness tests" as defined in National Planning Policy Framework (NPPF) (paragraph 182) and can confirm in our view the following tests have been satisfied:</p> <p>Positively prepared: the AAP has been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.</p> <p>Justified: the AAP represents the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence</p> <p>Effective: the AAP is considered to be deliverable over its period and based on effective joint working on cross boundary strategic priorities.</p> <p>Consistent with National Policy: the AAP enables the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.</p>	We believe that the AAP meets the "soundness tests" as defined in National Planning Policy Framework (NPPF) (paragraph 182)	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/PEEL/027	Mary Peel	AAP				N		<p>We need inward investment, but consuming ever more green belt land is not the answer as there is a surplus of under developed brownfield sites. This is a far more realistic and sustainable use of resources. Our area certainly needs jobs and sustainable growth, but the planners ought to be linking this to sites proximate to rail links as excess road traffic is a major problem in the region. Further, rail transport will mitigate the impact on the environment and human health. The ruination of green belt land through development is permanent and never to be replaced.</p>	The use of land within the Green Belt is not appropriate when there are vacant brownfield sites.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The exceptional circumstances required to justify the release of land from the Green Belt, is set out in the Exceptional Circumstances for Releasing Land from the Green Belt TBR (PSD12). The Commercial and Employment TBR (PSD11) reviews the most recent Employment Land Reviews from STC and SCC which have examined what land is available in the two Local Authority areas. Both highlight that there is a lack of modern, efficient industrial space for medium and large occupiers. The TBR also states that Nissan production process requires supply activities to be located as close to the plant as possible. In addition, the AAP identifies a package of highway and public transport improvements to be secured to minimise the impact on the local highway network (as identified in policy T1, T2 and T3) the need for which has been evidenced in the Transport TBR (PSD19). This TBR also refers to a draft study being undertaken on behalf of Nexus which considers the feasibility of extending the Tyne and Wear Metro. The Councils consider that the IAMP is the most suitable and sustainable location.	No modification proposed

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1016/ROBB/043	N Robb	AAP						To IAMP Trustees, I would say to you that the plot is bigger than Nissan's existing plant. My question is why? And is the Wardley Colliery site not good i.e. it has rail links (disuses to Usworth nr. Asda so the goods yard there would be better.	Consider Wardley Colliery as an alternative site.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which requires modifications to the Plan. The Exceptional Circumstances for the Releasing Land from the Green Belt TBR (PSD12) to meet the identified need considered looks at Wardley Colliery. It is not allocated for employment uses and is designated as a Local Wildlife Site in the South Tyneside Development Management Policies DPD. It was considered as an alternative site to the land south of Follingsby Park, but was dismissed as a candidate given its identification as a local wildlife site and 'therefore employment development would be inappropriate'. The Inspector for the Core Strategy and Urban Core Plan for Newcastle and Gateshead surmised in paragraph 194 of his report that in considering the proposed extension to Follingsby Business Park 'other locations outside the borough were investigated but none was found to meet the identified need'.	No modification proposed
210916/NISSAN/032/ A	Nissan Motor Manufacturing (UK) Ltd	AAP						Nissan Motor Manufacturing (UK) Ltd. support the general proposals for the development of the International Advanced Manufacturing Park and the policies set out within the Publication Draft AAP. To attract automotive component suppliers to this park will help Nissan to maintain a competitive edge within the highly competitive industry of automotive manufacturing. Nissan therefore supports 'The IAMP Vision' and 'The IAMP Objectives' as stated in sections 2.6 and 2.7 of the Publication Draft.	Nissan (UK) support IAMP and the policies set out in the AAP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/NELSAM/026	North East Land Sea and Air Museum (NELSAM)	AAP				N		Policy S6 should be amended to be supportive of NELSAM the Hub area detailed in Policy S6 omits any reference to NELSAM, a museum which currently occupies 3.5 acres under an existing lease with Sunderland Council. NELSAM has also been granted planning approval to expand the area to a total of 5 acres. All of this lies within the boundaries of the area set aside for the Hub. The museum has been in existence for over 40 years and has run successfully, without Local Government funding. The museum has occupied its current location for over 30 years after relocating from the Airfield site to make way for the Nissan Development. The existing lease has a renewal clause which the museum satisfied many years ago. Negotiations have been on-going various parties within Sunderland Council for at least the last 8 years and certainly pre-date the IAMP concept. As stated in section 4.2.1 the museum has been through a review to look at whether it is appropriate for the museum to	Reference to the NELSAM is omitted from Policy S6 as an existing use adjacent to the proposed Hub.	Include reference to the NELSAM	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. The supporting text to support policy S1 (PM41) has been altered for clarity to recognise that the museum is existing on the site and is anticipated to remain.	PM41

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								remain at the current location. As part of this review an Options appraisal report was commissioned, in conjunction with Sunderland Council, from Tricolour Associates to look at the options for the museum. This report has been discussed by interested parties in Sunderland Council. The outcome of this is the conclusion that the museum should remain at its current location. This has been stated in writing to the museum by Fiona Brown, Director of People Services. This decision is to be welcomed as it consistent with the statements contained within WA3 of the UDP and Section 12 of the National Planning Policy Framework which appear not have been addressed in Policy S6 The Trustees and Board members of NELSAM believe that Policy 6 should be amended to be inclusive of the museum and recognise the museum's regional significance by making a clear statement of support. One of the stated aims of Policy S6 is to provide Leisure activities which the museum currently does. A statement of support is also especially important as the City moves forward with its bid for City of Culture 2021, where the museum is working with the Museum Service and the Cabinet Member for Heritage to investigate how the museum could be expanded to co-locate other Council supported Heritage activities in one site. Before IAMP the Cabinet Member for Heritage was supportive of growing the footprint to 14 acres which is still a small proportion of the overall IAMP area				
071016/NELNP/040/A	North East Local Nature Partnership	AAP						There is a significant economic opportunity for the North East in this proposal and although it requires deletion of land from the Green Belt, with the right environmental enhancement, mitigation and a "net gain" approach to habitat and water quality, it is considered that biodiversity gains can be made.	Represents a significant economic opportunity but with right 'net gain' approach biodiversity gains can be made.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
240916/STOREY/001	Paul Storey	AAP				N	N	I have attended a consultation meeting about the IAMP at Boldon Village Hall and after talking to the planning representative there I disagree entirely with the IAMP proposal. There are a lot of existing manufacturing/ industrial/ business parks in Sunderland and South Tyneside and all have empty units or development sites available. All within easy commutable distance from Nissan. I appreciate this falls within government policy for the Northern Powerhouse etc. but this was all decided prior to the Brexit vote and since then industrial output has declined. Nissan is currently deciding whether to increase production in Sunderland or actually pull out so there is little point in destroying greenbelt land until this decision is made. The rep also said there had been a lot of consultation	Does not support IAMP as there are a lot of business parks in Sunderland and South Tyneside that have empty units and queries what impact will Brexit have on demand.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Exceptional Circumstances for Release of Land from the Green Belt TBR (PSD12) examines if there are any alternative large sites within the North East to accommodate IAMP and the Commercial and Employment TBR (PSD 11) examines more specifically the land availability in Sunderland and South Tyneside. Both TBRs conclude that there is no alternative land for the scale of the business park needed for IAMP, in proximity to Nissan.	No modification proposed

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								with Nissan's supply chain and a lot of positive feedback with companies saying they would relocate to the North East to be closer to Nissan. However, when I asked for examples he could not give me any. I then asked if there had been any companies signing up to definitely come to the IAMP he said no! This appears like wishful thinking on behalf of the government and involved councils and is a "shot in the dark!" on a "if you build it they will come" basis. This is a large amount of Greenbelt land we are talking about bulldozing and without any assurances from companies intending to come to it should we not do more consultations or wait until the full extent of Nissan's future plans become known? At the very least do we not need to look at the scale of the project and start with a smaller chunk of land and seeing what the uptake is before just going smashing into the greenbelt?				
090816/MORRIS/014	Peter Morris	AAP						No comments received (just wishes to be notified when the AAP has been submitted, when the Inspectors Report will be published and when the AAP is adopted).		No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
220916/STT/024	Save the Trident or Tony Jarret	AAP					N	We as a group are against the plans of the present parks boundaries as it shows that that the museum would not exist as the plans state at the moment although we would embrace the park if the museum was allowed to stay and grow. We believe that the IAMP would benefit hugely by including the museum in its plans and upgrading the facilities, buildings By keeping the museum their with upgraded facilities and buildings there would be a greater potential reached from the IAMP Firstly the companies that move into the manufacturing park could bring their up to date technology's to the museum which would run alongside exhibits of yesteryear creating an experience for the public like no other museum. The nearest like it would be Enginuity at Ironbridge/ By doing this it would also be a way the companies on the park could bring potential clients to see their technology in operation of which in turn would bring more prosperity and jobs to the area as contracts are won. Secondly Education , the museum plays a big part in learning with schools and outside school groups like scouts , cubs and as well as disabled groups. It also has our Trident aircraft to go on which is probably the only one in the northeast you can go on of which many children and adults have never done. Thirdly by keeping the museum with a little extra growing land available for expanding the councils of Sunderland and South Tyneside could potentially save huge amounts of tax payers money each year	The NELSAM should be retained and upgraded as part of IAMP.	Include reference to the retention of NELSAM and allowing it to grow.	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. The supporting text to support Policy S1 (PM41) has been altered for clarity to recognise that the museum is existing on the site and is anticipated to remain.	PM41

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								<p>which could be diverted to other services if they looked at condensing other collections that would be appropriate to the museum site thus not requiring to pay out costs on other sites but still providing these collections and services to the Northeast and the public that they serve fourthly. Has the councils ever thought of running a couple of the museums trams out of the museum on a track that could run from one side of the park over to the other connecting up to the bus route that brings the public and business workers down to the hub which would keep it a lot environmentally greener.</p> <p>A nostalgic bus could also run to Sunderland , Durham Newcastle too, I have a great vision for the museum that coexists hand in hand with the park that i believe would bring more prosperity and jobs, after all the museum would create jobs in itself. All i ask is if you could keep the museum and square it off up to the bowling green and across and down to the vulcan as the Trident needs a bit more room to be able to put together and use a little more of the spare land.</p>				
220916/SIMPSON/021/A	Stephanie Simpson	AAP						<p>I would like to point out AGAIN, that I think that this consultation period has been handled in an non inclusive and appalling fashion. Websites that we have been directed to give formal complaints, were created in "PDF" formats and therefore could not accept the complaints!</p> <p>The wording on all documentation from the start were in "jargon" and therefore not inclusive to the general public. Maps were confusing. Plus the tactic from the beginning of this "consult" was one of a forgone conclusion as the questions put the general public did not give an option of NO, it only gave the option of choosing one of the 3 scenarios – which is a typical selling tactic. When I have flagged in the past that your website (which is how the general public have been urged to make their opinions through) does not work because of the formats you have created the forms in – I got NO response!</p> <p>From the start of this "Consultation" I believe the general public have NOT been given the tools or information to give an informed opinion. Your Forms have NOT been adequate or easy to use (in some cases could NOT be accessed at all because of the PDF) When we asked whom had received letters – no-one could give us a definite answer – we live within this area and did not receive the 1st 2 letters. Family members also live in Usworth and Donwell which are the nearest village's to the proposed site and again NONE of them received any letters.</p>	The consultation was not inclusive, fair or unbiased, information was in jargon and maps were confusing. All documents provided in PDF format on both Council's websites.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Statement of Compliance (PSD10) sets out that the approach to consultation for the Publication Draft was in accordance with both Council's Statements of Community Involvement. The Councils have undertaken extensive consultation in accordance with their SCIs. The Councils in total notified 16,874 households and 508 local businesses of this consultation, details of which are included in the compliance paper.	No modification proposed

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220916/SIMPSON/021/B	Stephanie Simpson	AAP						Putting all of the North East's eggs in the automotive industry basket is a very risky long term strategy which will affect our green belt forever. As stated there are many brown field sites "unused" on both sides of the A19 which could simply be redeveloped.	There are many brownfield sites unused on both side of the A19. Concerns over emphasis of growth on only the automotive sector.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Exceptional Circumstances for Releasing Land from the Green Belt TBR (PSD12) examines if there are any alternative large sites within the North East to accommodate IAMP and the Commercial and Employment TBR (PSD 11) examines more specifically the land availability in Sunderland and South Tyneside. Both TBRs conclude that there is no alternative land to accommodate the need in terms of scale of business park in proximity to Nissan for IAMP and the Commercial and Employment TBR also establishes the need for the IAMP.	No Modification Proposed
100816/ LOUNTON/009/B	Stephen Lounton	AAP						(2) There is no demand for this type of manufacturing space as there is currently more than enough spare capacity with the Tyne & Wear area, which on current trends will more than serve the need of any potential manufacturing expansion well beyond 2027. (3) There are currently many better traditional manufacturing sites, with better infrastructure and transport links, based within Sunderland and South Tyneside, which are vacant and could be, or with a modicum of foresight should have been, utilised for this type of development e.g. Vaux site and traditional industrial areas along the banks of the rivers Tyne and Wear. (6)The Tyne and Wear area currently has spare capacity, in automotive, advanced manufacturing, off-shore (in severe decline due to depleted oil reserves) and hi-tech industries. Therefore, the above objections (1.- 5.) in fact reduce the claim of "£300 million investment and creation of 5,200 jobs" to a political sound-bite which is repeatedly used as an excuse by politicians to try to justify a proposal to controversially destroy the quality of life of desirable residential areas which attract the relatively wealthy, highly skilled workers necessary for investors to create high value businesses and sustainable economic growth.	There is no demand for this type of manufacturing space, there are better vacant sites in Sunderland and South Tyneside and there is spare capacity for automotive, advanced manufacturing and off-shore and high-tech sectors.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Exceptional Circumstances for Releasing Land from the Green Belt TBR (PSD12) examines if there are any alternative large sites within the North East to accommodate IAMP and the Commercial and Employment TBR (PSD 11) examines more specifically the land availability in Sunderland and South Tyneside. Both TBRs conclude that there is not alternative land in proximity to Nissan for the IAMP.	No modification proposed
100816/ LOUNTON/009/A	Stephen Lounton	AAP						(1) It is an inappropriate, unsustainable and unsuitable development in the environmentally sensitive "green belt" corridor preventing urban sprawl between the vast conurbations of Sunderland, South Tyneside and Gateshead.(7) The urban sprawl created by the proposed development would deter investors due to necessary high skilled workers moving away to seek a better quality of life rather than living in a downward spiral of benefits dependent urban wasteland very much like South Shields and Sunderland of today. (8) There are no benefits created by the proposal and no justification whatsoever for destroying the Green Belt as no exceptional	Inappropriate development in the Green Belt, creating urban sprawl. No justification for development in the Green Belt	No modification proposed.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Exceptional Circumstances for Releasing Land from the Green Belt TBR (PSD12) sets out the exceptional circumstances for releasing land from the Green Belt. This also describes how the development of IAMP would impact on the five purposes of Green Belt (paragraph 80 of the NPPF). Most development is focused immediately west of the A19 and along	No modification proposed

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								circumstances exist for doing so. In fact Sunderland and South Tyneside have for decades pursued exactly the same flawed and failed planning policy which has resulted in both areas becoming less and less desirable to live, work, socialise, invest and aspire to a better quality of life that green, recreational, leisure, natural and agricultural land generates.			the A1290 to limit sprawl. Furthermore the Design TBR (PSD13) describes the development of the Masterplan Objectives which seek to ensure a development and layout that is attractive to modern occupiers.	
100816/ LOUNTON/009/D	Stephen Lounton	AAP						(5) There is no evidence, in the form of letters of understanding or contracts that any investors propose to create or finance any jobs whatsoever (or indeed exactly what types of jobs they would be or whether the necessary skills actually exist in the area).	No evidence that jobs will be created or that the skills needed exist.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Commercial and Employment TBR (PSD 11) includes reference to the skills needed and that residents with these skills are resident in Sunderland, South Tyneside, Durham and Gateshead. In addition, this TBR highlights that Nissan confirmed the production of 2 new models (X-Trail and Qashqai) in October 2016, post the EU Referendum and this will require an enhanced supply chain and ensures that the Sunderland Plant continues to produce cars.	No modification proposed
260916/WGPTDTBB/023/H	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	AAP						Of the three options that formed the basis of the consultation on the Green Belt and Site Selection Options Paper, the interested parties supported Option 2 as it was considered to have benefits which would not be realised by the other two options including; connectivity to the highway network, reducing traffic congestion and providing greater access to the local workforce; the opportunity for the first phase of development close to the Nissan plant which would include the hub. The existing road network would support the initial phase without significant expenditure on highway infrastructure. The publication draft AAP has selected Option 1 as the preferred option as the basis with amendments to incorporate elements from Options 2 and 3 With these amendments to Option 1, the interested parties support the preferred option now selected.	Support for the Preferred Option.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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210916/NWG/033/A	Northumbrian Water or NWG	Pa. 1.1						Northumbrian Water Group fully supports the joint production of the draft AAP by South Tyneside Council and Sunderland City Council and consider that the document will guide sustainable development on the IAMP site and promote the region's economic growth. We have reviewed the draft AAP in detail and we set out comments below on topics which we feel are of relevance or have an impact on us, as the statutory water and sewerage undertaker.	Support the production of a Joint AAP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
290916/NATENG/038/D	Natural England	Pa. 1.8 2						We advise that improved flood risk management and climate change adaptation are also benefits of Green Infrastructure. This is also the function of the SuDS that are mentioned later in the text and that are part of Green Infrastructure also.	Improved Flood Risk management and climate change adaptation are also benefits of Green Infrastructure.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/WGPTDTBB/023/A	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	Pa. 2.1						The interested parties consider the IAMP will have a vital role to play in providing suitable land for the North East's automotive and advanced manufacturing industries to underpin their continued success. It is also recognised that projects such as IAMP will contribute to achieving the objectives of the Government's Northern Powerhouse Strategy and attract significant investment to the North East region to support economic growth. As such, the interested parties remain fully supportive of the business case for the IAMP.	Support for the business case for IAMP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/NFU/028/A	National Farmers Union in the North East	Pa. 2.3						We would be keen to see matters relating to land acquisition and potentially CPO resolved with impacted parties at an earlier stage as possibly during the negotiations. This will enable the agricultural businesses impacted time to make arrangements and plan for the future.	Keen to see matters relating to land acquisition are solved with impacted parties at an earlier stage as possible to enable the agricultural businesses impacted time to make arrangements and plan for the future.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP sets out the policy framework for IAMP. Potential land acquisition is outwith the AAP.	No modification proposed

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260916/WGPTDTBB/023/B	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	Pa. 2.5						The AAP notes in relation to site availability that the land in the IAMP AAP boundary is owned by a relatively small number of parties, many of whom own large areas. As such, as a last resort compulsory acquisition powers may be included in the Development Consent Order (DCO). Exercising use of the powers will be detrimental to the delivery of the IAMP project causing time delay and may be costly. This may put the project at risk and all efforts should be made by the scheme promoters to negotiate with owners.	Exercising use of compulsory acquisition powers will be detrimental to the delivery of the IAMP project causing time delay and may be costly.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
070916/HARDIE/004/B	Miriam Hardie	Pa. 2.5 Pa. 3.6 1 Pa. 4.2 2	N	N	N	N	N	(The IAMP) It is not justified, there is no evidence to justify the policy.	IAMP is not justified.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP is supported by technical evidence to support the approach taken in the AAP.	No modification proposed
210916/NISSAN/032/B	Nissan Motor Manufacturing (UK) Ltd	Pa. 2.6						Nissan therefore supports 'The IAMP Vision' and 'The IAMP Objectives' as stated in sections 2.6 and 2.7 of the Publication Draft.	Nissan (UK) support the IAMP Vision and IAMP Objectives.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
071016/EA/042/A	Environment Agency	Pa. 2.6 Pa. 2.7						We support the IAMP vision and Objectives, in particular objectives 9, 10 and 13. As the River Don runs through the development the IAMP core principals should utilise the river as an asset and not a constraint to development.	Respondent expresses support for IAMP Vision and Objectives.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/IAMPLLP/035/F	IAMP LLP	Pa. 2.6 Pa. 2.7						IAMP LLP believes that the Publication draft AAP and supporting evidence base reflect its own aims and objectives for the IAMP scheme.	IAMP LLP believes that the Publication draft AAP and supporting evidence base reflect its own aims and objectives for the IAMP scheme.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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210916/NWG/033/B	Northumbrian Water or NWG	Pa. 2.6						We strongly support the vision identified for IAMP, which includes reference to the site being a 'planned and sustainable employment location' and consider that water management should form a key element that contributes to the wider sustainability of the site.	Support the Vision for IAMP	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
210916/NWG/033/E	Northumbrian Water or NWG	Pa. 2.7						We are pleased to note reference to flood alleviation and water quality in relation to the River Don in Objective 13, which has the scope to positively impact upon the wider River Don catchment in line with the vision of the Don Integrated Catchment Project, which is led by the North East Local Nature Partnership and includes South Tyneside Council and Sunderland City Council as partnership members. Northumbrian Water have contributed to and signed up to the Don vision, and initiated the River Don Partnership which will develop an action plan to deliver this vision, so we are keen to see how we can support new development to maximise opportunities for environmental benefit to improve the catchment environment for all parties.	Support Objective 13.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/HISING/029/B	Historic England	Pa. 3.1	N			N	N	This section states that the IAMP AAP has been developed in accordance with requirements of the NPPF, including the presumption in favour of sustainable development. However, as we have noted above, we can find little evidence that the plan has been prepared in accordance with the NPPF guidance on the historic environment. The NPPF provides clear guidance on cultural heritage in its section 12, paragraph 129 which states that 'Local planning authorities should identify and assess the particular significance of any heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimize conflict between the heritage asset's conservation and any aspect of the proposal.' We can find no evidence within the AAP, the supporting evidence, or the SA (Sustainability Appraisal), that this has been done. It is also worth noting that the NPPF is clear in paragraph 7 that there are three dimensions to sustainable development, and the environmental role includes the need to protect and enhance the historic environment.	We can find little evidence that the plan has been prepared in accordance with the NPPF guidance on the historic environment.	The Plan preparation has not had regard to the NPPF guidance on the historic environment.	Modifications are proposed to the Plan. A Statement of Common Ground has been agreed with Historic England to agree the modifications to the AAP that would satisfy them that AAP was made sound and withdraw this objection (PSD8). These are considered to be minor modifications to the Plan. These are proposed changes to section 2.5 IAMP Site (PM21), section 4.4.1 Masterplan Objectives (PM59), Policy D1 (PM60) and the Policies Map (PM90). In addition, changes have been agreed to the Planning Policy TBR (PSD18) and the Sustainability Appraisal Addendum (PSD5).	PM21, PM59, PM60, PM90

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260916/HISING/029/C	Historic England	Pa. 3.3	N			N	N	As noted above, the AAP does not appear to be supported by any evidence on cultural heritage or the historic environment. It is therefore unclear how the AAP is compliant with paragraph 169 of the NPPF.	Unclear how AAP is compliant with Para 169 of NPPF.	No modification proposed	Modifications are proposed to the Plan. A Statement of Common Ground has been agreed with Historic England to agree the modifications to the AAP that would satisfy them that AAP was made sound and withdraw this objection (PSD8). These are considered to be minor modifications to the Plan. These are proposed changes to section 2.5 IAMP Site (PM21), section 4.4.1 Masterplan Objectives (PM59), Policy D1 (PM60) and the Policies Map (PM90). In addition, changes have been agreed to the Planning Policy TBR (PSD18) and the Sustainability Appraisal Addendum (PSD5).	PM21, PM59, PM60, PM90
260916/NFU/028/B	National Farmers Union in the North East	Pa. 3.3.2						It is noted that South Tyneside's Strategic Land Review has identified the site as an 'exceptional circumstances' for releasing land from the green belt. The NFU appreciates that our agricultural land, whether it forms part of green belt or the wider countryside, is valued through the town planning system for the essential role it performs for food production and for its landscape and environmental qualities, as well as its network of public footpaths. We seek further details on what impact future development may have upon the surrounding area, and if further 'exceptional circumstances' could be afforded.	Seek details of what impact the proposed development may have on the surrounding area.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan (PSD8). The potential impacts of the IAMP proposal are outlined in the evidence supporting the AAP (Transport TBR (PSD19), Flood Risk and Drainage TBR (PSD15), Ecology TBR (PSD14), Landscape TBR (PSD17), Geotechnical TBR (PSD16) and the AAP includes policies which seek to ensure the impacts of the development are mitigated.	No modification proposed
100816/ROBINSON/037	David Robinson	Pa. 3.6						In your new consultation leaflet dated 08/08/2016, there is no mention or site plan indicating what is happening to the existing Aircraft Museum. Could you please tell me what is proposed for the future plans to preserve the museum.	The respondent would like to know what is happening with the Aircraft Museum	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. The educational value of the NELSAM is understood. NELSAM is working closely with Sunderland City Council (SCC) to support the future for the museum. The general supporting text (PM21) and supporting text to support policy S1 (PM41) has been altered for clarity. It does not affect the soundness of the plan.	PM21 PM41
070916/HARDIE/004/A	Miriam Hardie	Pa. 3.6	N	N	N	N	N	At the public consultation meeting I attended on 17 August 2016, I was informed 2018 would be the earliest development would commence. Brexit and other factors might mean that the required investment and companies are not secured for the IAMP. Does this mean the Councils, if approval is given for the IAMP could have a back door to use this site for housing instead even though the land review said the area was not suitable for housing development in a separate exercise.	Brexit and other factors might mean that the required investment and companies are not secured for the IAMP. Does this mean the Councils, if approval is given for the IAMP could have a back door to use this site for housing instead.	No modification proposed as it is only employment uses proposed.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP seeks to allocate land for employment use. Policy S3 of the AAP states that proposals for residential development shall not be permitted.	No modification proposed

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090816/DARLING/002	Brian Darling	Pa. 3.7.4			N			I should be grateful if you would advise me on the cost of the Infrastructure Works for this scheme. (I do believe the project is a wonderful idea building on the back of Nissan's success in Washington over the last 20 or so years, but the most important issue in any grand scheme in my opinion is that the project has to be achievable. I do not believe this project sadly is achievable). It is widely acknowledged that Industrial Development, and to a lesser extent, Commercial Development in the North East is unviable in financial terms. What makes this scheme different from any other in the North East. Will you be relying on Grant Aid to make it happen? What happens if Nissan decide to relocate from Washington to a site owned by Renault in France in 5 to 10 years' time as a result of Brexit. Where does that leave the scheme?	Respondent would like to be advised of the cost of the infrastructure works and the funding sources being used. They also highlight the risk of relocation of Nissan	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Infrastructure Delivery Plan (IDP) (PSD21) which accompanies the AAP sets out the infrastructure required to support the delivery and the cost of the IAMP and the funding sources for the infrastructure. The Commercial and Employment Technical Background Report justifies the demand for IAMP.	No modification proposed
070916/HARDIE/004/C	Miriam Hardie	Pa. 3.7.3	N	N	N	N	N	The report concludes that the area around A19/Testos roundabout is suitable for development. However in a recent public consultation as part of South Tyneside Councils Local Plan for Housing this area was deemed unsuitable for development by STC's own Planning Officer who took three years to review land in the borough. The area is green belt. Please explain how the councils have determined that the A19/Testos roundabout is now suitable for development. STC used nine consistent factors within their Strategic Land Review including designated Green Belt site. What factors other than availability of City Deal Funding were considered for the IAMP assessment.	The land is within the Green Belt. STCs Strategic Land Review considered the land was not suitable for development. The respondent is challenging why the land is now considered to be suitable.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Whilst this land was considered by STC and SCC in their own assessments for their wider plan making to have a Green Belt function, the need for the IAMP and its particular location adjacent to an existing automotive hub, help to demonstrate the exceptional circumstances required to justify the release of land from the green belt, which is set out in the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12). This TBR also sets out that there were no alternative, suitable locations in the North East.	No modification proposed
220916/CCE/018/B	Church Commissioners for England	S1						Our final concern relates to the delivery of the scheme from a landowner's perspective. There are a number of different landowners within the proposed site and, in our experience, a major part of delivering any large development site is in the land assembly. The Draft offers very little detail as to how South Tyneside and Sunderland City propose to achieve this and there has been limited consultation with the principle landowners to date. We would welcome more detailed discussions with both Councils as to their proposals to deliver the land for the scheme and are keen to work positively and proactively with both authorities to see the delivery of the IAMP proposals.	The respondent seeks to understand how the land will be assembled to deliver the scheme and expresses willingness to work positively with the Councils to deliver IAMP.	No modification proposed	The Councils consider there are no soundness or legal compliance issues raised by this representation which require modifications to the plan. The Councils consider that the AAP as supported by the Infrastructure Delivery Plan (IDP) is deliverable. IAMP is a Nationally Significant project and therefore it is anticipated that land acquisition will be negotiated by IAMP LLP as a last resort by compulsory acquisition through a DCO.	No modification proposed

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240916/CPRE/016/B	CPRE	S1						The IAMP is premised on Nissan remaining in Sunderland. Whilst there are many indicators that it will do so and in fact is expected to expand production, we note the recent comments from the Japanese at the G20 summit with regard to the Brexit negotiations and as a result believe it cannot be ruled out that Nissan may reconsider its options and close the Sunderland plant. Should this occur we consider the need for the IAMP will cease and the land must be retained within the Green Belt. The remaining specialist and advanced manufacturing business can be directed onto the land vacated by Nissan which is already allocated for employment use.	The CPRE qualify, that should Nissan reconsider the future of the Sunderland Plant, the need for IAMP does not exist and therefore the land must remain in the Green Belt.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Commercial and Employment TBR (PSD11) states that in October 2016, Nissan confirmed that the Sunderland Plant would produce the next generation Qashqai and the X-Trail from 2018/19 onwards and will require an enhanced supply chain to support this production.	No modification proposed
260916/IAMP LLP/035/I	IAMP LLP	S1						We consider that Policy S1 is essential and at the heart of ensuring a high quality and well-functioning advanced manufacturing cluster that is attractive to occupiers and investors, and able to respond with agility to market needs.	We consider that Policy S1 is essential and at the heart of ensuring a high quality and well-functioning advanced manufacturing cluster that is attractive to occupiers and investors, and able to respond with agility to market needs.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/NCC/034/D	Newcastle City Council	S1						Overall the comprehensive development of the IAMP in general is supported	Support for Policy S1 and comprehensive development.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
210916/NISSAN/032/C	Nissan Motor Manufacturing (UK) Ltd	S1						We would however make the comment that if the land proposed for the IAMP is taken out of the Green Belt there are sufficient safeguards to protect the land for sole use of Automotive Supply Chain businesses and Tier 1 suppliers to Nissan along with the provision for engineering, innovation and skills development. We consider this land should not be used for major office developments, other retail storage units or retail warehouses. The proposed IAMP Development should follow the Comprehensive Development set out in Policy S1 and all planned activities on IAMP should be carried out in accordance with this policy to ensure no adverse impact on Nissan business. Development in an unplanned, uncoordinated manner is not appropriate for a site of such national economic significance.	Support for the comprehensive development as set out in Policy S1 and seeks sufficient safeguards to ensure the land is for the sole use of Automotive Supply chain and Tier 1 suppliers to Nissan along with provision of engineering, innovation and skills development.	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy S3 (PM43) to limit the IAMP site to principal uses and not allow any other uses to access the IAMP site.	PM43

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210916/NISSAN/032/E	Nissan Motor Manufacturing (UK) Ltd	S1						<p>Regarding the timing of IAMP commencement, we request that all decision making processes are kept to the shortest possible times as we would not want to miss the opportunity of a key supplier relocation to meet Nissan manufacturing schedules.</p> <p>Should a key supplier wish to relocate before the current IAMP schedule we would request that special measures could be put in place to accommodate such a relocation onto the proposed IAMP site. Finally we are an active member of a working group with Sunderland City Council on all items relating to IAMP and we would hope all comments made at meetings would be taken into consideration.</p>	Should a key supplier wish to relocate before the current IAMP schedule we request special measures are put in place to accommodate such a relocation onto the IAMP site.	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to amend Policy S1 (PM40) to allow for other applications to come forward outside of the DCO framework, subject to meeting a set of criteria that will not prejudice the delivery of the comprehensive development of the IAMP.	PM40
210916/NWG/033/G	Northumbrian Water or NWG	S1						We support that the emerging Local Plan references the importance of careful masterplanning of the IAMP site and seeks to avoid piecemeal development. Masterplanning is particularly important in the context of drainage and flood risk to ensure that an appropriate, sustainable drainage strategy is identified at the outset that will accommodate all phases of future development.	Supports comprehensive development of the site	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
051016/TEFP/039/A	Town End Farm Partnership	S1						Proposed Policy S1.B states that only the delivery of a single comprehensive scheme which meets the objectives of the IAMP AAP will be supported. What this means, following a review of the supporting text, is that the site should come forward as one proposal rather than "piecemeal" as envisaged by the draft Core Strategy. So the policy proposition is that anything other than comprehensive delivery (this is not explained) would be considered prejudicial to the delivery of the IAMP AAP objectives and overall delivery. What Policy S1 and the objectives of the AAP fail to consider at all is the immediacy of delivery. The AAP covers demand and supply (evidenced in various documents including the Green Belt justification document and the PwC report) however it does not seek to address the clear immediate demand for employment floor space which cannot be addressed by the DCO process. Only an immediate application (such as TEF's current planning application for industrial accommodation to meet the existing and urgent needs of Nissan Tier 1 suppliers) is capable of comprehensively addressing the delivery of a floor space for immediate requirements in the market before the end of 2017. We object to this policy as there is no evidence base to suggest that the joint authorities can control both the delivery of IAMP and the end users. There is a need for flexibility in the Masterplan, given that delivery is over a 15 year period and a start date for the IAMP scheme is some years away. Further, there is no evidence base to suggest that a 100 hectare site can	Policy S1 fails to consider the immediacy of delivery. Only an immediate application is capable of addressing the delivery of floorspace for immediate requirements before the end of 2017.	We therefore request that this draft emerging policy is clarified and amended to ensure that individual planning applications, such as the current planning application by TEF, can be accommodated as part of a comprehensive development of the site. That is to say that the proposals which are AAP compliant should be classified as comprehensive development for the purposes of Policy S1. The term "delivery of a single comprehensive scheme" requires clarification. This is unachievable and not	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to amend Policy S1 (PM40) to allow for other applications to come forward outside of the DCO framework, subject to meeting a set of criteria that will not prejudice the delivery of the comprehensive development of the IAMP. A comprehensive framework for development is central to ensuring that the development is supported by sufficient infrastructure and mitigated appropriately.	PM40

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								be delivered in accordance with the Masterplan and phasing regime. By comparison, there is clear evidence of an immediate economic need for employment floor space which is unlikely to be satisfied if Policy S1 remains as currently drafted.		supported by any evidence. It is assumed that this wording seeks to underpin the importance of the Masterplan and the delivery proposals of De1 and 2 (Objections below). From a scheme delivery perspective there is no guidance to support the delivery of substantial applications made by anyone other than the scheme promoter (i.e. Sunderland City Council and South Tyneside Council).		
260916/WGPTDTBB/023/C	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	S1						Policy S1 of the AAP which states the IAMP will be delivered only as a single comprehensive scheme is supported and is necessary to clearly demonstrate exceptional circumstances for releasing land from the Green Belt. A Masterplan for the IAMP is welcomed together with a phasing plan, although there is a balance to be struck in providing sufficient detail to assist development without being too prescriptive that the operational requirements of potential developers / occupiers are not able to be met.	Support for Policy S1 which seeks to deliver a single comprehensive scheme, supported by a masterplan.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which requires modifications to the Plan.	No modification proposed
240916/CPRE/016/A	CPRE	S2						Of particular concern to CPRE is the IAMP requires deletion of a significant area of Green Belt. Nationally, CPRE is the only body that seeks to protect the Green Belt and so we look at proposed deletions with great care. In addition, we note that National Planning Policy Framework paragraph 83 states "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan." We accept that this Area Action Plan is part of the Local Plan process for both Sunderland City Council and South Tyneside Council but have considered this proposal with care to see if "exceptional circumstances" are in fact made out. Consequently we have taken particular notice of the "IAMP AAP: Exceptional Circumstances for Releasing Land from the Green Belt: Technical Background Report".	The CPRE has considered the evidence to support the exceptional circumstances for releasing land from the Green Belt for IAMP and considers that this has been demonstrated.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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								<p>We note this document presents a case for “exceptional circumstances”, in particular:</p> <ul style="list-style-type: none"> • The success of Nissan and other advanced manufacturing businesses and their associated businesses in bringing employment and economic success to the region, plus the projected benefits; • The requirements of those businesses, in particular proximity of businesses, the interconnectedness of businesses; and excellent transport links; • The analysis of possible alternative sites, none of which are adjudged to meet all the necessary criteria. We also note that in the documentation for the AAP: • there is repeated mention of the land being available for only specialised manufacturing and its supporting businesses; • there will be a design guide for buildings. Design will be critical, especially the “mass” and colour of the buildings (including the roofs). The heights of buildings should be constrained to maximum permitted heights, perhaps similar to the heights of the Nissan plant and the buildings on Boldon Business Park, so that so far as is possible in the circumstances they “settle” into the landscape and do not protrude unduly on the landscape. Taller buildings than this must be avoided. With regard to colour, buildings should be of colours which help them blend into the landscape, not stick out; • the protection and enhancement of the River Don corridor and wildlife in general both on the site and beyond. <p>In light of the above CPRE accepts, subject to below, that a case for “exceptional circumstances” exists in this case and so will not be opposing the creation of the IAMP.</p>				
210916/SIMPSON/020/A	David Simpson	S2						<p>The close proximity of IAMP proposal would have a massive affect on our enjoyment of the area, views and standard of living as well as devaluing our houses. I have already spoke to local agents who say both properties would be less desirable to live in or let and would decrease in value because of the IAMP development.</p> <p>The development of the latest Vantec site is further away than some of the IAMP proposals but has caused us concern already. Because of the openness of the fields in front of us and the lack of natural barriers there has been constant banging heard from early in the morning and the bright lights shining straight at us at night (picture below of Vantec at night). These massive factory units are having a negative affect on us and I can only see it getting worse if the IAMP proposal is granted planning permission.</p> <p>The proposal also we feel is contrary to planning law where you</p>	<p>The respondent is concerned about the impact of IAMP on their amenity, the use of land within the Green Belt and question if this site is needed for IAMP when there are other vacant sites nearby.</p>	<p>No modification proposed</p>	<p>The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP includes a policy on amenity (policy EN4), which considers the impact on surrounding residents and seeks to minimise disturbance. Mitigation measures are proposed to minimise the impact of the development on the local environment and amenity.</p> <p>Section 7 of the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) sets out the exceptional circumstances to justify the release of this land from the Green Belt. A shortage of employment land in South Tyneside and Sunderland suitable for accommodating</p>	<p>No modification proposed</p>

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								<p>should only develop greenbelt land under exceptional circumstances and would join up local villages where the greenbelt should remain established. Developing properties for 25 years these greenbelt laws are what I have always been told from Sunderland council when asking about developing greenbelt sites. There are many other sites other than greenbelt land this proposal could be developed on, especially now that all land nearby from Nissan to the bottom of Sulgrave has been developed on by Johnson control, Unipres, fergisons transport, vantec, Nissan car parks and now the ongoing Vantec aforementioned site (close to the bird wildlife sanctuary), which again we were not informed of. The local community I have spoken to feel this is a step too far taking up the final pieces of greenbelt of Washington unnecessarily and want a stop to it before nothing of the greenbelt is left for future generations to enjoy. Should the proposal be granted will there be any compensation for us for the Negative affect it will have on our property value and impact on our lives? We will hopefully be informed of the process from now on and options/infrastructure arrangements that are proposed.</p> <p>We have passed many unutilised Business Parks all the way along the A19 Corridor – which have already been developed and are lying empty, surely this would be a better use than taking yet more Greenbelt – which (as you said at the meeting, the lifespan of the automotive industry in this area may only be another 30 years – and that this makes up 80% of the IMAP Business Park, with the further 20% being feeder companies for the automotive industry) In 30 years will be looking at even more disused factory wasteland!</p>			automotive businesses and advanced manufacturing has been identified and this is described in the Commercial and Employment Technical Background Report (PSD11).	
260916/GC/017/A	Gateshead Council	S2						<p>Policy S2 sets out the Councils' approach to designating Green Belt and safeguarded land. Criterion B states: "Areas of safeguarded land shall only be released for development through a review of the AAP, where it can be demonstrated that there is insufficient land within the allocated employment areas to accommodate development needs." Although the criterion makes clear that a revision of the IAMP AAP is the only means by which safeguarded land can be released for development, neither the policy nor its supporting text give an indication of how the Councils will determine whether there is sufficient land within the allocated employment areas to accommodate development needs. The monitoring framework provided within Appendix B identifies a contingency measure for monitoring the implementation of this policy (and the trigger for a review of the IAMP AAP), stating: "If 50% of the land is taken up by year 5, then consider an early review of the</p>	<p>Policy S2 did not indicate how, when assessing the need for future release of safeguarded land, the Councils will determine whether there is sufficient land within the IAMP's allocated employment areas to accommodate development needs. The monitoring framework within Appendix B provided a contingency measure for monitoring the implementation of policy S2, but this did not provide</p>	<p>Policy S2 should be revised to give greater clarity on how a review of the plan might be undertaken with a view of releasing safeguarded land.</p>	<p>It is proposed to modify the Monitoring Framework (PM94) to clearly set out how and when consideration will be given to the release of the safeguarded land. Uptake will be monitored on an annual basis and once 50% of the site has been developed, a review of the AAP will be undertaken to determine if it is necessary to release the safeguarded land for development.</p>	PM94

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								<p>AAP to release the safeguarded land". However, this approach does not appear to provide a clear mechanism for how the capacity of the IAMP will be reviewed after year five of the project's implementation.</p> <p>The future release of safeguarded land (50ha) at the IAMP could have significant implications for economic development in the wider area, and for Gateshead's policy approach to the provision of employment land. In our view, the policy would benefit from increased clarity regarding which criteria need to be fulfilled before a review of the IAMP AAP would be deemed necessary. Inclusion of some criteria within policy S2 or its supporting text (rather than the current reference within the monitoring framework table) would also aid transparency. In our view, appropriate criteria would establish how future development needs at the IAMP will be determined, and set out how these needs will be considered against the remaining capacity of land within the IAMP. Policy S2 and the approach to monitoring this policy appear to refer only to an exploration of the demand for, and supply of employment land within the allocated employment areas of the IAMP.</p> <p>Notwithstanding the specific sectors that will be the focus of development at the IAMP, in our view a more effective assessment of the need to release safeguarded land would consider the supply of suitable and deliverable employment land in other nearby locations, including those within Gateshead. Such an approach would be in keeping with the Duty to Cooperate, and would aid in minimising the potential displacement effects of the IAMP project. Considering the supply of employment land in nearby areas will be of particular relevance if development within the IAMP's allocated employment areas contains occupiers operating outside of the automotive and advanced manufacturing sectors.</p>	<p>a clear mechanism for how the capacity of the IAMP will be reviewed after year five of the project's implementation. Gateshead Council suggested that the AAP includes criteria which will be used to assess future development needs, and that these criteria include assessing the availability of employment land within Gateshead</p>			
260916/GC/017/B	Gateshead Council	S3						<p>Policy S3 aims to establish the principal uses that will be located within the IAMP. Supporting text to the policy notes that, in order to protect against potential future changes to permitted development rights, the long term uses of the IAMP for the automotive and advanced manufacturing sectors will be secured through a requirement in the Development Consent Order (DCO). Providing a robust and unambiguous planning framework for the uses that are to be located within the IAMP is likely to be a key factor in its success as a strategically important employment location. Criterion B of policy S3 aims to establish criteria which will be used to assess where development proposals not associated with automotive or</p>	<p>Policy S3 did not make clear what the 'principal uses' are, and it was considered that the policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would reduce its contribution to supporting growth in advanced manufacturing and</p>	<p>Policy S3 did not make clear what the 'principal uses' are, and it was considered that the policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would reduce its contribution to supporting growth</p>	<p>Minor modifications have been proposed to Policy S3 (PM43) to set out a clear definition for what the Principal Uses are. Further minor modifications to the policy have also been proposed to ensure that premises are retained for their original use in the long term.</p>	PM43

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								<p>advanced manufacturing sectors will be acceptable. For proposals to be considered acceptable, criterion B.iii. requires applicants to demonstrate “that there are no alternative, suitable locations” that could accommodate the proposal. The AAP does not indicate the geographic area that should be used in the assessment of alternative, suitable locations.</p> <p>Given the IAMP’s close proximity to Gateshead, and a number of our employment areas, we consider the policy would be more effective if it is made clear that assessments of suitable, alternative locations should include an appraisal of potential development sites in Gateshead.</p> <p>Accordingly, we consider that policy S3 should more clearly specify the principal uses that will be considered appropriate within the IAMP. Implementing the IAMP vision will mean the development of the IAMP primarily for B2 and B8 uses, and these Principal Uses should be clearly defined within the AAP policy. Clearly identifying the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses “as set out in policy S3”.</p>	<p>automotive sectors. In addition, criterion B.iii. required applicants to demonstrate ‘that there are no alternative, suitable locations’ that could accommodate proposals for non-principal uses. Gateshead Council would like the text to be amended to make it explicit that any appraisal should include potential development sites in Gateshead.</p>	<p>in advanced manufacturing and automotive sectors. In addition, criterion B.iii. required applicants to demonstrate ‘that there are no alternative, suitable locations’ that could accommodate proposals for non-principal uses. Gateshead Council would like the text to be amended to make it explicit that any appraisal should include potential development sites in Gateshead.</p>		
260916/NCC/034/A	Newcastle City Council	S3						<p>it is not clear what the ‘principal uses’ are, and it is considered that the policy should be tightened up to prevent the IAMP becoming a general business / industrial park which could compete with Gateshead and Newcastle’s offer and the delivery of the CSUCP. The supporting text advises that ‘the policy also seeks to maintain a degree of flexibility in the consenting of future uses for the IAMP’. Accordingly, clear identification of the Principal Uses within policy S3 would also support the implementation of other AAP policies, including policy S4, which makes reference to the Principal Uses “as set out in policy S3”.</p>	<p>Policy S3 is not clear what the ‘principal uses’ are. The policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would compete with Gateshead and Newcastle’s offer and the delivery of their adopted Core Strategy and Urban Core Policies (CSUCP).</p>	<p>The policy should be tightened up to prevent the IAMP becoming a general business/industrial park which would compete with Gateshead and Newcastle’s offer and the delivery of their adopted Core Strategy and Urban Core Policies (CSUCP).</p>	<p>The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy S3 (PM43) to limit the IAMP site to principal uses and not allow any other uses to access the IAMP site.</p>	PM43
260916/WGPTDTBB/023/D	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	S3						<p>Policy S3 states the principle use for the IAMP is employment development directly relating to the automotive and advanced manufacturing sectors for production, supply chain and distribution activities. This reflects the vision and is aligned with the objectives for the IAMP as stated at paragraph 2.7 of the AAP. The policy does allow for Use Class B2 and B8 employment development from other sectors although this is only acceptable subject to satisfying a number of criteria. It is considered critical, particularly in the early phases of development, that the focus for development is the automotive supply chain and related advanced manufacturers only.</p>	<p>It is considered critical that the focus for development is the automotive supply chain and related manufacturing uses only and the scale of retail and ancillary uses should be clarified.</p>	<p>Modification to clearly set out floor space for principal uses and retail provision.</p>	<p>The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy S3 (PM43) to limit the IAMP site to principal uses and not allow any other uses to access the IAMP site. Policy S5 and S6 have been modified to clearly state appropriate retail uses and their scales.</p>	PM43

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								Otherwise there is the potential for the IAMP to simply become a large employment site which does not then succeed in achieving the vision and objectives and for which there are no exceptional circumstances for releasing Green Belt. In terms of protecting the IAMP AAP area from other uses, the policy states at criterion D. proposals for residential development and development outside those stated in Policy S5 shall not be permitted. The policy text then makes reference to large scale retail or leisure uses above 1,500sqm gross not being acceptable. This is not entirely consistent with Policy S5 in that the floorspace threshold of 1,500sqm gross referred to in this policy is for 'a range of local scale retail and leisure uses (up to a total of 1,500sqm gross)'. The wording of Policy S5 infers there will be a number of smaller retail units, such as bank, newsagent, sandwich shop, coffee shop, rather than one unit of 1,500sqm. The policy text for Policy S3 should be reviewed and amended to clarify matters. The reference is to large scale retail or leisure. How has the threshold of 1,500sqm gross been determined as a definition of 'large' for a single unit? There are retailers that may be drawn to the site whose gross floorspace is less than 1,500sqm.				
260916/GC/017/C	Gateshead Council	S4						<p>Policy S4 identifies the mix of uses (in terms of amount of floorspace) that will be accommodated within the IAMP. Although the policy sets the total amount of floorspace for employment (B use class) uses within the IAMP, the policy does not indicate floorspace area(s) of individual units. Supporting text to the policy notes: "The IAMP AAP will facilitate provision for a range of unit sizes to encourage companies of varying scales to locate on the site. This approach offers the opportunity for business growth within the development to encourage future sustainability". We recognise the potential benefits of supporting the development of businesses located within the IAMP, and also acknowledge the need to accommodate a range of unit sizes within the IAMP to cater for the needs of different businesses. However, in our view, it would be appropriate for the majority of the IAMP's premises to be larger units capable of attracting and accommodating larger occupiers.</p> <p>An approach of focussing on the provision of larger premises, capable of accommodating established businesses would be in keeping with the IAMP's vision of establishing "A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries", and would also support the objective of attracting "European-scale 'super suppliers'". Provision of a relatively high proportion</p>	Policy S4 does not indicate floorspace area(s) of individual units. Furthermore, the AAP indicates that it 'will facilitate provision of a range of unit sizes to encourage companies of varying scales to locate on the site'. It is Gateshead Council's view that the majority of IAMP's premises should be larger units, which would be more consistent with the IAMP vision. The policy should be amended on this basis.	Policy S4 to be amended to establish scale of individual uses	The IAMP needs sufficient flexibility to enable it to meet the requirements of all users within the Principal Uses. Whilst it anticipated that the majority of development will be taken up by large floor plate users, it is considered that it would be overly restrictive to place any minimum requirement on the size of individual units.	No modification proposed

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								of larger units would also support the use of the IAMP by businesses operating in the automotive and advanced manufacturing sectors, reinforcing the Councils' approach of concentrating development within these specific sectors.				
260916/NCC/034/B	Newcastle City Council	S4						Further clarity is required on what the principal uses are. In addition, planning permission will be granted for a further 236,000 sqm for B1(c), B2 and B.8. Further clarity is required on what sectors this provision is for, what size the units will be and how this relates back and is ancillary to the objectives and purpose of the IAMP.	Further clarity is required on what sectors the provision of the 24,000 sqm of employment floorspace for B1(a) and B1(b) set out in Policy S4 relate to, in terms of what size the units will be, and how this relates back and is ancillary to the objectives and purpose of the IAMP	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy S4 (PM46) to provide clarity that the policy applies to the principal uses.	PM46 PM47
260916/NCC/034/C	Newcastle City Council	S5						Policy S6 'The Hub' advises that permitted uses are set out in Policy 5, however as S5 is not exhaustive this is difficult to quantify and as such there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, development of retail and leisure uses within the IAMP could detract from its contribution to economic growth. Accordingly, further clarification is required on how it is planned to control the location and quantity of ancillary uses.	Further clarity is needed in policies S5 and S6 on how it is planned to control the location and quantity of ancillary uses	No modification proposed	The Councils propose a modification to the Plan. This is considered to be a minor modification to the Plan and supporting text. To provide additional clarity and remove ambiguity it is proposed that both policies S5: Ancillary Uses and S6: The Hub are subsumed into a new policy called S5: Ancillary Uses and the Hub. This policy provides clarity on the scale of ancillary uses appropriate on the site to ensure that it is a supporting facility to the main employment use which comprise the Automotive and Advanced Manufacturing led International Advanced Manufacturing Park. (PM48, PM52, PM54, PM55, PM56, PM57, PM58)	PM 48, PM52, PM54, PM55, PM56, PM57, PM58
051016/TEFP/039/B	Town End Farm Partnership	S5						Drafted Policy S5 is confusing, and it does not provide the necessary certainty to deliver ancillary uses within the scheme. The small scale retail element is not sufficient to allow meaningful provision to entice national retailers to taking up floor space. NPPF paragraph 26 allows for up to 2,500 sqm (where there is no locally set threshold) of out of centre retail; anything above this requirement is considered as potentially having an impact on existing centres and therefore requires an impact assessment. The Report by Shandwick Properties, appended to this Representation, provides market commentary on the proposals which are contained within the live planning	Policy S5 does not provide certainty to deliver ancillary uses within the scheme. The small scale retail element is not sufficient to allow meaningful provision to entice national retailers to taking up floorspace. NPPF Para 26 allows for up to	We request that the ancillary policy be amended to provide certainty to retailers as to the location of a hub, given the likely demand for their goods and an inclusion for a car showroom given that local manufacturers will	The Councils propose a modification the plan. This is considered to be a minor modification to the Plan. To provide additional clarity and remove ambiguity it is proposed that both policies S5: Ancillary Uses and S6: The Hub are subsumed into a new policy called S5: Ancillary Uses and the Hub. This policy provides clarity on the scale of ancillary uses appropriate on the site to ensure that it is a supporting facility to the main employment use which comprise the Automotive and Advanced Manufacturing led	PM54, PM55, PM56, PM57, PM58

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								application by TEF, and the Report includes an assessment of why such uses would not be successful outside of the proposed Hub element of the live planning application. Policy S5 of the AAP states that the delivery of the Hub should match with the take up of employment land. It is therefore reasonable to conclude that the Hub will take some time to develop. TEF already have end users identified and those end users are committed to the provision of the Hub on-site and in a central location. This also assists in the attractiveness of the site for investment.	2,500 sq. m of out of centre retail.	want to showcase their product.	International Advanced Manufacturing Park. The Planning Policy TBR (PSD 18) states that the existing development plans for Sunderland and South Tyneside have a hierarchy of centres and the scale and type of uses appropriate in each. However, The Hub is not proposed as a new 'local centre' in its own right and the AAP is clear that the purpose of the Hub is to provide supporting facilities for existing and future employees and the proposal scale reflects this. The Design TBR (PSD13) sets out that this is an important feature of a successful business park to enable formal and informal interactions between businesses. (PM54, PM55, PM56, PM57, PM58).	
051016/TEFP/039/C	Town End Farm Partnership	S5				N	<p>The Hub as submitted within the TEF live application is, very clearly, sequentially preferable to the location as proposed within the AAP (August 2016) and the location is more central and easily accessible and visible from the A19, which is essential to attract and signpost the IAMP to national and international investment.</p> <p>The location as proposed by the TEF is within 750 m of all the proposed Employment Development and retains a suitable distance from the existing Nissan complex, allowing clear interaction between the two sites, which would be enhanced through the creation of suitable pedestrian, cycle and transport links.</p> <p>The proposed Hub location in the live scheme was very carefully considered by TEF to ensure that it would be accessible to pedestrians and therefore will ensure that short journeys to the Hub, as a focal point, are kept to a minimum by private car.</p> <p>There is no reasoned justification or evidence for the re-located hub point and in fact does not represent a sustainable location for the IAMP AAP proposals as can be seen by considering the appended Reports from:</p> <ol style="list-style-type: none"> 1. WSP 2. Shandwick Properties We largely agree with AAP proposals for the end use of the Hub. It makes good sense for retail and leisure uses to be complimented by nursery and childcare facilities, as well as a hotel and associated leisure and conference facilities. <p>Within Policy S5 of the AAP it is stated that "Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use." There is no doubt of the need for a Hub, as has already been described within the proposed development and this would primarily serve a</p>	The location of the Hub as submitted with the TEF live application is, very clearly, sequentially preferable to the location proposed in the AAP.	Modification proposed to move hub to alternative location.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Hub has been located in the south-east corner of the AAP area to allow the existing Nissan (and suppliers) site employees to access the Hub, alongside the development proposed through the AAP. This provides an existing user base to access the services and facilities at the hub. In addition, the Design TBR (PSD13) explains this further stating that the proposed location of the Hub opposite Nissan provided a critical mass of activity as Nissan employees over 7,000 workers who could reach the hub within a five minute walk and will help to make it viable. It will also create a sense of place as the proposed Hub location links to the network of greenspaces and footpaths proposed within the IAMP scheme. There are commercial uses already present in the proposed location of the Hub, this enables these uses to be integrated in to the IAMP scheme appropriately. It would also reduce activity along the ecologically sensitive River Don corridor. Furthermore, the proposed minor modifications to Policy S5 support a modest scale of retail uses (cumulative total of 1,000 sqm) in the Northern Employment Area to ensure that there are some facilities in this location which support the role of the Hub.	No modification proposed	

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								demand from the employees of the existing Nissan site and the new IAMP site.				
260916/WGPTDTBB/023/E	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	S4						Policy S4 details the mix of uses with up to 24,000sqm of employment space for B1(a) and B1(b) considered acceptable where it is in support of the Principle Uses specified in Policy S3. As Policy S3 allows for general B2 and B8 uses, for sectors other than the automotive supply chain and related advanced manufacturers, the provisions of Policy S4 therefore allows for general B1(a) and B1(b) development to sit alongside. As Policy S4 is currently worded, there is potential for 24,000sqm of general office and research and development floorspace to be development within the IAMP that is not connected with the automotive supply chain and related advanced manufacturers which seems to be in conflict with the objectives of the IAMP in that any B1(a) and B1(b) development should be to support the automotive supply chain and related advanced manufacturers. It is considered some general office development is acceptable but the primary focus should remain on office space to support the automotive supply chain. Outside of the B Class Uses, complementary ancillary uses are necessary to support the delivery of the IAMP as a sustainable development. As evidenced in successful industrial locations such as Team Valley in Gateshead, with reference to Main Gate, complementary ancillary uses typically include small shops, cafes, banks, training and conference facilities, hotels, child-care facilities and gyms. The purpose is to provide business related facilities required by occupiers / tenants to assist with the operation of their business and also for employees to make use of before starting work, after work and during breaks.	As S4 is currently worded, there is potential for 24,000sqm of general office and research and development floorspace to be developed within IAMP that is not connected with the automotive supply chain and related manufacturers. Some general office development is acceptable but the primary focus should remain on office space to support the automotive supply chain.	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy S3 (PM43) to limit the IAMP site to principal uses and not allow any other uses to access the IAMP site. It is also proposed to modify Policy S4 (PM46) to provide clarity that the policy applies to the principal uses.	PM43 PM46
260916/WGPTDTBB/023/F	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	S5						Specifying the acceptable ancillary uses within the policy provides clarity. However, it is considered that it should be made clear that any education and training facilities must relate to the automotive sector and the associated supply chain only otherwise the intention of the policy is lost and it is open to misinterpretation. The wording of criterion B. of Policy S5 is confusing for two reasons. At criterion A. education, training, leisure and hotel uses are stated as acceptable and this is clear. However, criterion B. states "Ancillary uses associated with education, training, leisure and hotel uses shall be located within or next to 'the Hub' unless an alternative appropriate location within the IAMP development area can be demonstrated to be necessary..." (underlining – own emphasis). Firstly, it is not clear what exactly ancillary uses associated with education, training, leisure and hotel uses are. Secondly, the location of where within the IAMP the development of the	Notes that there is inconsistency in the scale of ancillary uses proposed in policy S5 and S6. Ancillary uses should only be within the Hub.	To support the delivery of a sustainable scheme the following ancillary uses shall be permitted to form the 'Hub' within the IAMP area, in the location shown on the Policies Map, as part of the comprehensive scheme comprised in the IAMP DCO application: i. Education and training facilities to support the	The Councils propose a modification the plan. This is considered to be a minor modification to the Plan. To provide additional clarity and remove ambiguity it is proposed that both policies S5: Ancillary Uses and S6: The Hub are subsumed into a new policy called S5: Ancillary Uses and the Hub. This policy provides clarity on the scale of ancillary uses appropriate on the site to ensure that it is a supporting facility to the main employment use which comprise the Automotive and Advanced Manufacturing led International Advanced Manufacturing Park. In addition, the policy proposes a very limited scale of retail use in the Northern Employment Area to support the uses in that part of the site (PM54, PM55, PM56, PM57, PM58).	PM54, PM55, PM56, PM57, PM58

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								<p>stated ancillary uses are acceptable is confusing, particularly with reference to Policy S6: The Hub which states the permitted uses for the Hub are specified in AAP Policy S5. The wording of the policies S5 and S6 need to carefully considered. As currently drafted, it is not clear in reading criterion B. of Policy S5 whether there will be a defined boundary so there is a distinction between being 'within or next to' the Hub. The interested parties support the principle of ancillary uses within the IAMP area and the uses specified at criterion A. of Policy S5. It is considered the ancillary uses should only be provided at the Hub, in the location shown on the Policies Map at Appendix A of the AAP, otherwise the purpose of the hub and the benefit of locating the ancillary facilities together is diluted and lost. Given this, criterion D. of Policy S5 which allows further retail and leisure provision of up to 1,500sqm gross north of the River Don should be deleted. The criterion is contrary to the vision and objectives for the IAMP. It is also the case that the location of the hub was shown at the centre of the scheme adjacent to the River Don on Option 1 at the Site Selection Options stage but, as stated in the Exceptional Circumstances for Releasing Land from the Green Belt – Technical Background Report (paragraph 6.3.7.1), the preferred option relocated the hub, as the location for ancillary uses, to the southern part of the area so it can be used by existing employees on the Nissan site adjacent as well as the new employees within the IAMP.</p> <p>The final sentence of Policy S5 states "Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use." Furthermore, within the second paragraph of the policy justification reference is made the ancillary facilities being accessible and beneficial to "the residents of surrounding residential areas." As stated above, the purpose of including ancillary facilities within the IAMP area is to serve existing workforce at Nissan and the future workforce of the IAMP. The purpose is not to provide a facility for local residents and divert trade away from the shops and services being used in the community.</p>		<p>automotive supply chain and related advanced manufacturers; ii. Managed workspace (up to 3,000sqm gross floorspace); iii. A range of local scale retail units (Use Classes A1, A2 and A3) and leisure uses (up to a total of 1,500sqm gross floorspace); vi. Nursery and child-care facilities (up to a total of 1,000sqm); and iv. A hotel with associated leisure and conference facilities. B. Ancillary uses shall not prejudice the operation of uses within Use Class B including the expansion of operations. C. Ancillary uses will be provided to serve the existing businesses in the locality and new businesses within the IAMP area." Reference to "the residents of surrounding residential areas." in the policy justification should also be removed.</p>		
260916/GC/017/	Gateshead Council	S5 and S6						<p>Policy S5 aims to establish the Councils' approach to ancillary uses within the IAMP. Ancillary uses will provide an important supporting function within the IAMP; however, if left unchecked, there is potential for retail and leisure uses in particular to occupy space in the IAMP that would be better used by industrial occupiers. In this way, inappropriate</p>	<p>Further clarity is needed in policies S5 and S6 on how it is planned to control the location and quantity of ancillary uses.</p>	<p>An unambiguous policy framework guiding the location and quantity of ancillary uses within the IAMP as a whole,</p>	<p>Minor modifications have been proposed to merge Policies S5 and S6 and supporting text to offer greater clarity regarding the Hub and Ancillary Uses. The revised policy clearly sets out which use classes would be acceptable and the scale of development which would be</p>	<p>PM48, PM52, PM54, PM55, PM56, PM57, PM58</p>

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								<p>development of retail and leisure uses within the IAMP could be detrimental to the project, and could detract from its contribution to economic growth. Accordingly, a clear and succinct policy is required to control the location and quantity of ancillary uses. We consider the current structure of policy S5 results in some ambiguity regarding the appropriate quantity and location of ancillary uses within the IAMP.</p> <p>Criterion A of policy S5 sets out the type and quantity of ancillary uses that will be acceptable within the whole of the IAMP, and states: "To support the delivery of a sustainable scheme the following ancillary uses shall be permitted within the IAMP [our emphasis] as part of a comprehensive scheme comprised in the IAMP DCO application". The criterion goes on to specify the total quantity of floorspace that will be permitted for some ancillary uses, including a total of 1,500sq m for retail and leisure uses. Criterion B specifies that ancillary uses of education, training, leisure and hotel uses shall be accommodated within or next to the Hub. Although supporting text to policy S6 suggests that the Hub will be a key location for retail uses, restaurants and cafés, such uses are not mentioned within criterion B of policy S5. Criterion D of policy S5 states: "In addition to the Hub location, small scale retail and leisure provision of up to 1,000sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don". Criterion D of this policy (unlike criterion A) does not make clear whether the amount of ancillary floorspace specified is the total quantity of floorspace that will be permitted, or the maximum area that will be acceptable for a single unit. Assuming that criterion D sets out the total retail and leisure floorspace that will be acceptable within the northern part of the IAMP, applying this alongside criterion A suggests that there will only be 500sq m of retail and leisure facilities within the Hub location, which does not seem appropriate for its status as the 'focal point' for ancillary facilities.</p> <p>An unambiguous policy framework guiding the location and quantity of ancillary uses within the IAMP as a whole, and within the Hub location specifically would contribute to a more effective policy, and we respectfully suggest that revisions are made to improve the clarity of policy S5.</p>		and within the Hub location specifically would contribute to a more effective policy, and we respectfully suggest that revisions are made to improve the clarity of policy S5.	appropriate. The revised policy also indicates that ancillary uses shall only be permitted in 'The Hub', with small scale provision within the Northern Employment Area. Minor modifications are also proposed to the Policies Map, which clearly show the location of the Hub and Northern Employment Area referred to within the policy. (PM48, PM52, PM54, PM55, PM56, PM57, PM58)	

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260916/WGPTDTBB/023/G	W Gordon Proud Trust, and Buckley Burnett Limited, and Diane Talbot	S6						The Hub is supported subject to the suggested amendments made above to Policy S5. However, the first sentence of the policy justification states the Hub “performs the role of a local centre within the IAMP AAP.” It is noted that reference to the Hub being a ‘local centre’ is also made in paragraph 3.3.2.5 of the Planning Policy Technical Background Report. As commented upon above, the purpose of forming a ‘hub’ of ancillary uses within IAMP area is to provide facilities for the existing and future workforce. The ‘hub’ of ancillary uses should not seek to perform the role of a local centre. The use of the term ‘local centre’ will cause confusion as it has a particular definition when referring to retail planning policy. In the glossary of the National Planning Policy Framework, references to town centres also applies to local centres. Whilst it is understood any centre has to be identified as such in Local Plans, otherwise it does not constitute a town centre, it is necessary to distinguish the ‘hub’ as ancillary uses that would not be acceptable unless forming part of the comprehensive scheme. We strongly suggest the words ‘local centre’ are removed from the publication draft AAP.	The Hub is supported subject to reference to it being a local centre is removed. It should not be seeking to perform the role of a local centre.	Remove reference to 'performs the role of a local centre within the IAMP AAP'	The Councils propose a modification the plan. This is considered to be a minor modification to the Plan. To provide additional clarity and remove ambiguity it is proposed that both policies S5: Ancillary Uses and S6: The Hub (PM54) are subsumed into a new policy called S5: Ancillary Uses and the Hub. This policy removes reference to the Hub being a 'Local Centre'.	PM54
071016/EA/042/C	Environment Agency	Pa. 4.4.1						The Don waterbody is classified as having poor overall and ecological status under the Water Framework Directive (WFD) and as heavily modified. As a result the waterbody cannot meet good ecological condition under WFD due to the amount of structural changes. There has been channelization and straightening within the urban areas and ditching in rural areas which has disconnected the river from the floodplain. In partnership with South Tyneside Council, Sunderland City Council, Local Nature Partnership and other stakeholders we are working towards delivering a vision for the River Don. The vision is to create a healthy and biodiverse catchment that is valued and enjoyed, contributing to the economic and social well-being of local communities. The catchment will provide a high quality environment that attracts new business and facilitates economic growth.	The River Don has poor overall and ecological status under the Water Framework Directive. EA, STC, SCC, LNP and others are working towards delivering a vision for the River Don. Request an objective for the river restoration of the Don to improve water quality and geomorphology.	Request an objective is included for the river restoration of the Don, specifically to improve water quality and geomorphology.	The Councils propose modifications to Policy EN2 (PM76) and EN3 (PM79) to reflect this submission. These are considered to be a minor modifications to the Plan. These modifications require development proposals to maintain and enhance the River Don as a functional ecological corridor and specify that there should be a minimum 50 metre buffer either side along the River Don. In addition, mitigation measures that will compensate for the development of the land allocated for employment use will result in environmental enhancement and water quality benefits. There is no proposed modification to incorporate the additional objective proposed. This is because any further policy related to the River Don Corridor will be considered in the emerging Sunderland and South Tyneside Local Plans. A River Don Strategy is also being prepared by public sector partners outwith the AAP.	PM76 PM79

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071016/EA/042/B	Environment Agency	Pa. 4.4.1						We support the Masterplan objectives and the necessity to protect the river don corridor.	Respondent expresses support for the Masterplan objectives and the necessity to protect the River Don.	No modification proposed	The Council consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/HISING/029/D	Historic England	Pa. 4.4	N			N	N	<p>We welcome the intention to steer the heights of buildings within the scheme to reduce impacts on views from areas such as the Penshaw Monument, which is a Grade 1 listed Monument.</p> <p>However, there is no mention within the supporting text of the need to sustain and enhance the historic environment, as required by the NPPF. Although there is mention of listed buildings within Policy D1, the wording of this policy only requires proposals to 'give consideration to the setting of listed buildings...', which is inadequate protection, referring only to the setting of the asset and not providing any protection for the asset itself. This policy is therefore non-complaint with both the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. We would draw your attention in particular to paragraphs 126 and 132 of the NPPF, and to section 66 of the Act, which states that 'in setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'</p> <p>IAMP is located on community fringes and the scale of the site should enable the development to become a local asset to all by improving connections with the landscape in the site design and delivery.</p>	There is no mention within the supporting text of the need to sustain and enhance the historic environment, as required by the NPPF. Although there is mention of listed buildings within Policy D1, the wording of this policy only requires proposals to 'give consideration to the setting of listed buildings...', which is inadequate protection, referring only to the setting of the asset and not providing any protection for the asset itself. This policy is therefore non-complaint with both the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.	The policy should be updated to offer sufficient protection to Historic Environment in accordance with the NPPF	Modifications are proposed to the Plan. A Statement of Common Ground has been agreed with Historic England to agree the modifications to the AAP that would satisfy them that the AAP was made sound and withdraw this objection (PSD8). These are considered to be minor modifications to the Plan. These are proposed changes to section 2.5 IAMP Site (PM21), section 4.4.1 Masterplan Objectives (PM59), Policy D1 (PM60) and the Policies Map (PM90). In addition, changes have been agreed to the Planning Policy TBR (PSD18) and the Sustainability Appraisal Addendum (PSD5).	PM21, PM59, PM60, PM90
260916/NFU/028/C	National Farmers Union in the North East	Pa. 4.4.1						We note the intention to steer development away from areas which are at risk of flooding and enhance the local environment. While the IAMP proposes to incorporate SuDS into the development, we would welcome a detailed assessment of all flood risks to both the development site and surrounding area.	Would welcome a detailed assessment of all flood risks to both the development site and surrounding area.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Flood Risk and Water Management Technical Background Report (PSD15) provides information on flood risk and the proposed mitigation on site. In addition, Policy IN2 require development proposals are accompanied by a detailed Flood Risk Assessment and Water Framework Directive Assessment.	No modification proposed

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210916/NWG/033/F	Northumbrian Water or NWG	Pa. 4.4.1						Furthermore, we support Objective 9 which states that design and development will be encouraged based on sound sustainability principles. We do however suggest that there is scope to include specific reference to sustainable water management, such as the requirement for sustainable drainage systems on new developments across the site. The inclusion of such a requirement within the objectives for IAMP would reinforce the aspiration for a flagship development that is world-class and sustainable across all disciplines.	Support Objective 9 but suggest including reference to sustainable water management such as sustainable drainage systems on the site.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Policy IN1 require that a surface water strategy is prepared and SuDs are provided as part of development proposals.	No modification proposed
071016/EA/042/E	Environment Agency	D1						Policy D1 - We support the design principles however would recommend that point iv. Could be amended to include a water quality element. This is supported by NPPF and the Water Framework Directive (WFD) ' Drainage Infrastructure to be incorporated within the street network with sustainable urban drainage systems (SuDS) placed to enable effective water management and improve water quality.' This is of importance given poor water quality accounts in part of the Don's failing WFD status.	Respondent requests a modification to policy D1 part iv to require SuDS to be an element of managing water quality.	Drainage Infrastructure to be incorporated within the street network with sustainable urban drainage systems (SuDS) placed to enable effective water management and improve water quality. A target/indicator of policy EN2 could be that there is no deterioration of the River Dons WRD status.	The Councils propose a modification to Policy D1 (PM60) to reflect this submission. This is considered to be a minor modification. Part IV of Policy D1 has been amended to include reference to effective water quality management.	PM60
260916/GC/017/E	Gateshead Council	D1						Policy D1 provides key design principles that will be used to shape the IAMP. Given the sensitivity of the River Don to nearby development, we suggest that protection and enhancement of the River Don corridor should be a key design principle for the IAMP, set out within policy D1. Effective water management and provision of landscape and ecology buffers will support this principle, as would a requirement for the proposed bridge crossing to be sensitively designed to minimise its impact on the River Don corridor. A requirement to protect and enhance the River Don Corridor would also be consistent with the policy approach Gateshead Council has taken to development at the South of Follingsby Lane employment site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP).	The protection and enhancement of the River Don corridor should be a key design principle for the IAMP, set out within Policy D1. A requirement to protect and enhance the River Don Corridor would also be consistent with the approach to development at the South of Follingsby Lane site, allocated within policy KEA2 of the Gateshead and Newcastle Core Strategy and Urban Core Plan.	Policy D1 updated to have protection and enhancement of River Don is a key design principle	Protecting the River Don Corridor is already identified as key Masterplan objective within the AAP and Policy D1 require any proposals to demonstrate compliance with all of the IAMP AAP Design Objectives. Area of ongoing cooperation 1. Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.	No modification proposed

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210916/NWG/033/H	Northumbrian Water or NWG	D1						<p>Within Chapter 4, we welcome that the Masterplan objectives include a surface level strategy for drainage which will reflect the natural environment and offer a broad range of benefits, including water quality improvements and sustainable flood risk management, alongside health, wellbeing and amenity value. We strongly support the reflection of this objective within Policy D1, where it is stated that drainage infrastructure is to be accommodated within the above-ground street network, with the utilisation of sustainable drainage systems, and also within Policy 02, which seeks the provision of green and blue infrastructure at street level. We further support the protection of the River Don corridor within the Masterplan objectives, which can provide an important green infrastructure function within the site whilst also minimising the impact of IAMP in the wider catchment.</p>	Support for Policies D1 and D2.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
190816/CA/013/A	Tyne and Wear Archaeology Officer	D1						<p>I am disappointed that the supporting documents do not include a report on the historic environment. Northern Archaeological Associates produced a historic environment desk based assessment (for a larger area) in 2014 for Mott MacDonald (which I have a copy of). CFA Archaeology was been appointed to do a scoping report for the AAP in June 2016. I would be interested in seeing CFA Archaeology's report. I am pleased to see that 135 hectares of land will be retained and enhanced as green open space. The site includes a grade II listed building (the late 18th or early 19th century Hylton Bridge). I think that this should be shown on the policies map. I am pleased to see that the bridge lies in an area which is not proposed for development. The 2014 historic environment assessment concludes that the site contains: a medieval settlement and ridge and furrow earthworks at Elliscrope Farm; grade II listed Hylton Bridge; Ridge and furrow earthworks; A cropmark possibly representing a rectilinear enclosure; Late 18th or early 19th century farms (Hylton Bridge, Hylton Grove, Elliscrope and Make-Me Rich, West Moor Farm, The White House); A late 18th or early 19th century public house (Three Horse Shoes); the site of a smithy (Smiths Farm is shown on an 1840s estate map of Hylton); Severn Houses (Hillthorn Terrace), a late 19th century speculative development; the former Stanhope and Tyne Railway (opened in 1834, out of use 1984), now under the A1290; the Personnel Accommodation (the North East Air Museum) and site of the Decontamination Unit for Usworth Airfield; Hangar from RAF Usworth re-located at the North East Aircraft Museum; Re-located picket Hamilton fort at Aircraft Museum; Buildings of former military use at Aircraft Museum; Circular cropmark in the bowling green next to Aircraft Museum (site of air raid shelter); A mixture of arable and pasture fields, defined by mature hedgerows and modern</p>	Disappointed that there is no a historic environment report accompanying the AAP. Hylton Grove Bridge should be shown on the proposals map. A programme of archaeological fieldwork will be required in advance of any applications being submitted. Will a new home be found for NELSAM.	No modification proposed	<p>Modifications are proposed to the Plan. A Statement of Common Ground has been agreed with Historic England (HE) to agree the modifications to the AAP, Sustainability Appraisal Addendum (PSD5) and Planning Policy TBR (PSD18) to satisfy HE that the AAP is sound in terms of how it represents the historic environment. These are considered to be minor modifications to the Plan. These are proposed changes to section 2.5 IAMP Site (PM21), section 4.4.1 Masterplan Objectives (PM59), Policy D1 (PM60) and the Policies Map (PM90). In addition, changes have been agreed to the Planning Policy TBR (PSD18) to provide supporting information and the Sustainability Appraisal Addendum (PSD5).</p> <p>A modification is proposed to the plan to clarify the status of NELSAM. This is considered to be a minor modification to the Plan.</p> <p>The policies map has been amended to identify Hylton Grove Bridge (Grade II Listed). The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan.</p>	PM21 PM59 PM60 PM90

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								<p>fencing. The field system probably dates from the 17th century enclosure.</p> <p>As an undeveloped area of greenfield, the proposed development site also has the potential to contain as-yet unknown buried archaeological features (such as prehistoric or Roman remains).</p> <p>A programme of archaeological fieldwork will be required, in advance of a planning application being submitted. This would include a site walkover (to identify ridge and furrow earthworks, fields suitable for fieldwalking, post medieval enclosure etc.), geophysical survey, fieldwalking survey of any ploughed fields, building recording and evaluation trial trenching. I can provide specifications for the archaeological work when required.</p> <p>The setting of nearby designated heritage assets, and views to and from those assets, will need to be considered in a Heritage Statement.</p> <p>I presume that a new home will be found for the North East Aircraft Museum? The museum holds an irreplaceable collection of military and wartime artefacts, plus the aircraft themselves. There is a WW2 picket Hamilton fort in the grounds of the museum.</p>				
210916/SIMPSON/020/B	David Simpson	T1						Resident Local roads could not take the increase load of 5000 extra workers where Follingsby lane already has become a rat run and is dangerous at present with a narrow lane and people exceeding the 40mph speed limit, my wife has been forced into the side on several occasions by lorries, speeding cars, etc. coming at her in the middle of the road since Follingsby park was developed again on Greenbelt land.	Respondent is concerned about the increase of workers on local roads including using Follingsby Lane.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Transport mitigation measures have been identified to minimise the impact of the IAMP on the local highway network, as set out in policies T1, T2 and T3 and evidenced in the Transport Technical Background Report (PSD19). Policy T2 proposes to restrict Follingsby Lane to use for local access only and potentially public transport.	No modification proposed
071016/EA/042/F	Environment Agency	T1						We would advise that the new bridge over the River Don as referenced in point iii. will require a flood activity permit. This will assess the impact on flood storage and conveyance of floods water along with construction methodology. We would advise consulting us as early as possible in the design process of the bridge. We would like advise that the new bridge over the River Don will require a flood activity permit. We would recommend consulting us as early stage in the design process of the bridge and recommend that the soffit of the bridge would	Respondent advises that the new bridge over the River Don would require a flood activity permit.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Councils do not consider it to be necessary to include this in the policy as it is separate requirement. The necessary development consents and permits will be submitted prior to development of the site.	No modification proposed

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								be above the 100 year plus climate change level. We welcome the requirement of a detailed Flood Risk Assessment (FRA) to be prepared and submitted along with the DCO application. Further to this policy any flood risk modelling work to be undertaken will require verification from the Environment Agency. While we would agree that the main uses of the development are categorised as less vulnerable, however under the PPG there are proposals for more vulnerable development (nurseries) and essential infrastructure (road bridges) that will require more robust assessments to be undertaken.				
260916/GC/017/F	Gateshead Council	T1						Policy T1 relates to the mitigation of the highways impacts of the IAMP. The Councils have published a Transport Technical Background Report to support consultation on the publication draft AAP; however, this report does not provide detail on the transport modelling work that has been undertaken. Through ongoing dialogue, South Tyneside Council and Sunderland City Council have agreed to share this more detailed evidence on transport modelling with Gateshead Council. Once we have received and had the opportunity to review this evidence, we hope to be in a position to advise on whether we consider the approach to mitigating the IAMP's traffic impacts is appropriate, particularly regarding the potential impacts on Gateshead.	The Transport Technical Background Report does not provide detail on the transport modelling work that has been undertaken. Gateshead Council wish to review this evidence prior to establishing whether they are satisfied with the approach to mitigating the IAMP's traffic impacts.	N/A	Following submission of Gateshead Council's response to consultation on the IAMP AAP, the Councils have shared traffic modelling work for Gateshead Council's consideration. Area of ongoing cooperation 1. Transport Planners from Gateshead Council have provided feedback regarding IAMP traffic modelling, and the Councils have agreed to provide more detail on the impacts of the IAMP on the local road network. 2. The Councils will provide Gateshead Council with the Draft Nexus Public Transport Study following its presentation to the City Deal Board.	No modification proposed
110816/TURNER/010	Geoff Turner	T1						I read with interest your plans for this development. I'm all for creation of jobs and a modern, pleasant working environment, so good on you guys! So, my concern is the western access to this development. I frequently use the B1290 eastwards towards where I work at Boldon Business Park. In effect, I'm linking the A1 to the A19 but missing out the horrendous traffic tailbacks northbound at White Mare Pool roundabout. Anyway, I digress. Once you pass the 'new' fire station at Sulgrave the road bears right over the old railway crossing and then on the right you have the other recent development, Hillthorn. Now, after that the road turns sharp left and then sharp right once passed around seven houses on the right. Hope you are following me here. This road is busy, especially when there are problems on the A1231 eastwards or during peak times of Nissan working hours. This western approach to IAMP will be wholly inadequate for the added traffic such a development will make. That 'kink' surely needs to be straightened out, especially so for the lorries that regularly use this route? That's it really, just to highlight that the access road from that	B1290 is unsuitable in its current state for industrial traffic.	No modification proposed	The Councils consider that there has been no soundness or legal compliance issues raised by this representation. The Councils consider Improvements works to this section of A1290 are being undertaken outside the scope of the AAP.	No modification proposed

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								end is currently, I feel, unsuitable for more development along the B1290 in its present 'bendy' state.				
260916/HARWORTHSTATES/025/B	Harworth Estates	T1				N	N	Policy T1 identifies specific highway infrastructure and improvements that will occur within the area. Policy T1A (iii) includes a new bridge over the River Don to allow access to the northern part of the IAMP and this is supported. Policy T1A (iv) includes for new distributor roads within the IAMP to accommodate the movement of all users. If Follingsby Lane is to be downgraded for bus and cycle use only, then such distributors roads must include a road link within the IAMP to Follingsby Lane and specifically the industrial and distribution uses to the west of the site. Please see my other comments on behalf of Harworth Estates relating to the downgrading of Follingsby Lane.	The new bridge over the River Don is supported. But If Follingsby Lane is downgraded, request a road link within IAMP to Follingsby Lane.	It is suggesting that the wording of policy T1A (iv) is altered as follows: New distributor roads within the IAMP to accommodate the movement of all users ... (new text as follows) ... in the IAMP and area but also to facilitate connections to existing and proposed commercial areas outside the IAMP. This will ensure that the emphasis is placed on ensuring the IAMP is well connected to existing commercial and industrial uses in the area.	The Councils consider that there have been no soundness or legal compliance issues raised by this representation. Section 3.5 of the Transport TBR (PSD19) states that vehicles travelling from Follingsby Industrial Park will be able to gain access to the IAMP via the A184 and A19. Junction improvement measures being implemented by Highways England at Testo's and Downhill Lane are forecast to notably improve journey times for this route when the restriction of vehicular access on Follingsby Lane takes effect.	No modification proposed
061016/HEN/041	Highways England	T1	Y	Y	Y	Y	Y	We welcome that future highways infrastructure requirements have been identified within Policy T1, which also specifically recognises how the IAMP will connect to and integrate with Highways England's A19 improvements, including the Downhill Lane and Testos Junctions. As identified in Part B of the Policy, the IAMP DCO application will need to be supported by a phasing strategy and transport assessment to demonstrate the resulting implications for the SRN, which will enable Highways England to have the opportunity to review the application once it has been submitted. Part C of the policy can also be particularly supported as it ensures that development will not be supported where it would adversely impact on the safe and efficient operation of the SRN	Policy T1 is supported. As identified, a phasing strategy will be needed and a TA to support the DCO. Part C is supported as it ensures that development will not be supported where it would adversely affect the safe and efficient operation of the SRN. HE have reviewed the supporting transport evidence and whilst have	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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								or would compromise the delivery of Highways England's improvements to the network. Whilst this should provide sufficient comfort to Highways England that ultimately development will be appropriate and capable of being accommodated on the SRN without severe implications for network operation or safety, there is still the need to fully understand what these impacts are likely to be. Whilst we have a number of comments on the evidence that has been prepared to date, the conclusions are not considered to be fundamental to the soundness of the AAP. However, whilst we consider that ultimately the schemes at the Downhill Lane and Testos Junctions will be sufficient to support the quantum of development aspired to in the AAP, there is still the need to understand how future development will be phased alongside these planned improvements. We therefore look forward to our continued co-operation on the AAP and the preparation of the phasing strategy and transport assessment that will be submitted with the DCO application.	some comments, these do not affect the soundness of the AAP. There is still a need to understand how future development will be phased alongside HE planned improvements to the A19 as part of the DCO.			
260916/IAMPLLP/035/E	IAMP LLP	T1						In respect of highways matters, IAMP LLP is continuing discussions with Highways England and the Councils on the proposed package of highway improvements which have been identified as being required both to mitigate the impact of the IAMP and to address some of the existing highway capacity issues in the area. Detailed design work and discussions are ongoing on these matters and in particular the proposed improvements to the Downhill Lane junction which would improve access to the IAMP from the A19. We understand that Highways England currently plan to consult on their own DCO application in Autumn 2016. At the present time, IAMP LLP are content that policy TI provides an appropriate framework in relation to highways matters.	IAMP LLP are content that policy TI provides an appropriate framework in relation to highways matters.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/IAMPLLP/035/K	IAMP LLP	T1						Proposed bridge over the A19: This bridge is referenced in Policy TI and is required to connect the IAMP with the local road network to the east. As noted in section 5.1 the development of the IAMP site provides an opportunity for highway improvements to the road network to be implemented through the creation of new links and junctions. Detailed design work, including further modelling will be required to finalise the design of these measures, including the proposed bridge. We therefore request that Policy TI and the supporting text are amended so that the area identified on the Policies Map as "A 19 Improvements" is referred to as "A19 and Local Road Network Improvements" so as to include reference to the necessary improvements to the local road network to the east of the A19.	Request that T1 and the supporting text are amended so that the area identified on the Policies Map as "A 19 Improvements" is referred to as "A19 and Local Road Network Improvements" so as to include reference to the necessary improvements to the local road network to the east of the A19.	Amendment to the Policies Map to change "A 19 Improvements" to "A19 and Local Road Network Improvements"	The Councils propose to modify the Policies Map (PM90) to identify the 'A19 and Local Road Improvements'. The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan.	PM90

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210916/NISSAN/032/F	Nissan Motor Manufacturing (UK) Ltd	T1						<p>A key concern for Nissan at this stage of the Consultation is the fact that Highways England has not yet declared its proposed development plans for the improvement of the A19. Traffic congestion has always been a major concern for Nissan and the need for efficient access for both employees and logistics is an essential requirement for the success of manufacturing at Nissan.</p> <p>We have met with Highways England on several occasions to discuss potential improvement options to the A19 and have made comments that the proposed road layout Option 25 gives the best solution to avoid congestion and best means of entry and egress from the Nissan site for both employees and logistics. We strongly recommend that Option 25 is the proposed option adopted for the A19 and the Downhill Lane junction to support IAMP.</p>	Consider that Highways England's 'Option 25' provides the best solution to the A19 upgrade for Nissan and IAMP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Highways England (HE) is progressing highway scheme options for the A19 and the Councils are working closely with Highways England. The AAP seeks to align with this scheme, but is not directly facilitating the improvements. The Transport TBR (PSD19) confirms that HE have consulted on options for improvements to the A19 and Nissan support the layout proposed for the A19 upgrade.	No modification proposed
100816/ LOUNTON/009/C	Stephen Lounton	T1						(4) The proposed development will severely exacerbate traffic congestion problems in the area and thus would have a detrimental impact on the vital Nissan 'just in time' production process and therefore would also be detrimental to any potential manufacturers proposing to use the same process.	The development would exacerbate traffic congestion	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Transport TBR (PSD19) sets out the transport interventions necessary to ensure integrate the scheme into the surrounding network.	No modification proposed

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051016/TEFP/039/D	Town End Farm Partnership	T1				N		<p>The Policy as drafted identifies a number of improvements which are quoted at i-iv.</p> <p>There is no certainty regarding Highways England plans; indeed there is significant slippage to the consultation document of the options that are proposed to upgrade the Downhill Lane junction. It is considered by TEF that the entire Masterplan is undeliverable until such time as the final HE project is confirmed. In fact, the deliverability of the HE Downhill lane scheme is not programmed to be complete until 2020, undermining the Masterplan delivery as "a comprehensive scheme".</p> <p>The evidence base of the Transport Assessment (JMP 2016) refers to the following requirement "The new bridge over the A19, as identified as a requirement for capacity in the 'Washington Road Bridge Option Testing' report, will provide a suitable connection between the AAP area and the local road network to the east of the A19. This bridge will cater for all modes of transport, including non-motorised users, and will enable a greater route choice for all modes of transport".</p> <p>There is insufficient evidence to justify the proposed new bridge that would go over the A19 and along the southern boundary of the TEF land as has been presented. In fact the IAMP Masterplan does not show the bridge and so therefore we consider that this is misleading.</p> <p>The AAP also fails to provide a costing for this bridge and other requirements are identified but not costed, and therefore we question the scheme delivery and would be challenging this as part of DCO scheme and process.</p> <p>We object to the proposed inclusion of the A19 new bridge and request that it be deleted (Including reference in Table 1). It is unnecessary and unjustified, and at a cost which is unacceptable to the delivery of the wider AAP.</p> <p>Policy T1: Highway Infrastructure. ii). Should be deleted. In addition to reference to the bridge with Table 1.</p>	There is no certainty regarding Highways England plans. The entire (IAMP) Masterplan is undeliverable until such time that the final HE project is confirmed. There is insufficient evidence to justify the proposed new bridge over the A19 and the AAP fails to provide costing's for this bridge.	Object to the inclusion of the A19 bridge and request that it be deleted.	<p>The Councils will be required to maintain a close working relationship with Highways England (HE) as HE brings forward proposals for the A19 schemes through DCO process. HE is in the process of consulting on both its schemes at present.</p> <p>The Transport TBR (PSD19) states that traffic modelling work has confirmed the need for a new bridge over the A19 and forms a key mitigation for the development of the IAMP. It provides enhanced connectivity over the A19 and plays a key role in the disbursement of traffic by providing an alternative route choice for those travelling from the IAMP to residential areas of Sunderland to the east. This will reduce traffic levels on the A1290 and improve capacity on the A19 junctions. The Infrastructure Delivery Plan (PSD20) (PM89) sets out the infrastructure required to support delivery of the scheme and how this will be provided.</p>	PM89
260916/GC/017/G	Gateshead Council	T2						<p>Policy T2 sets out the Council's emerging policy on non-motorised transport at the IAMP. If sustainable transport options are to be optimised within the IAMP, and within this part of the region, policies should seek to firmly integrate sustainable transport options within developments. The current approach within policy T2, particularly within criterion A.i. and A.ii. places focus on accommodating cycleways and footpaths around planned changes to the highways network, rather than highlighting the importance of establishing a high-quality, integrated sustainable transport network.</p>	Policy T2 should emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.	Policy T2 should emphasise the value of integrated sustainable transport routes in encouraging sustainable commuting, and acknowledge the importance of connecting the IAMP with wider sustainable transport networks.	A minor modification has been proposed to criterion A(i) of Policy T2 (PM66) so that it is ensured that any junction / highway measures and any new roads are designed to safely integrate potential pedestrian and cycle movements. In addition, a minor modification is proposed to criterion A(ii) of Policy T2 to ensure that roads and spaces are designed to consider the needs for all types of users so that conflict between road users and vulnerable users is minimised.	PM66

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260916/HARWORTHSTATES/025/C	Harworth Estates	T2			N		N	It is noted that improving access and connectivity includes three objectives. They include the need to promote new highways connections to 'optimise access to the wider area'. The sole use of Follingsby Lane by bus and cycleway will fail to promote new highways connections to the wider area. In particular it will fail to take advantage of the opportunity to link existing industrial and distribution activities to the west of the site, focused on Follingsby Lane and the Wardley site, to the proposed IAMP. It is noted in the TP in paragraphs 2.87, and the introductory paragraphs, that a study has been done on the metro and the bus connections to the area however this is not included in this public consultation. We therefore have been unable to see and comment on this background evidence paper which may contain further justification and evidence for Follingsby Lane simply being used as a bus route. It is also noted that all of the proposed routes and all of the proposed connections to the existing Metro Line (paragraphs 2.8.8 and 2.8.9) make reference to Wardley and I can only assume that this is my clients land. Again as the evidence paper has not been included in the consultation we are not able to make any comments on this but would like to have sight of this as soon as possible to continue discussions with the relevant Authorities.	The sole use of Follingsby Lane by bus and cycleway will fail to promote new highways connections to the wider area. In particular it will fail to take advantage of the opportunity to link existing industrial and distribution activities to the west of the site, focused on Follingsby Lane and the Wardley site, to the proposed IAMP	Remove the policy. It is considered that the paragraph and policies that seek to restrict the use of Follingsby Lane should be reconsidered as it is not considered to be beneficial to the overall development of the IAMP. Policy make reference to transport linkage with Follingsby and Wardley site to the west.	The Councils consider that there has been no soundness or legal compliance issues raised by this representation. The Transport TBR (PSD 19) states that vehicles travelling from Follingsby Industrial Park will be able to again access to the IAMP via the A184 and A19. Junction improvement measures being implemented by Highways England at Testo's and Downhill Lane are forecast to notably improve journey times for this route when the restriction of vehicular access on Follingsby Lane takes effect. The Transport TBR is accompanied by a series of technical modelling notes. It is anticipated that the NEXUS reports will be available in March 2017.	No modification proposed
260916/NFU/028/D	National Farmers Union in the North East	T2						The plan includes provisions to improve access to the open space for recreational purposes. Careful consideration should be given to where the routes are and specifically where they are in relation to agricultural land. In instances where access routes run alongside agricultural land, fences should be substantial and well maintained to prevent trespass and impacts on the agricultural business. We would expect that in the event of alterations to rights of way, landowners are thoroughly consulted at an early stage.	Give careful consideration to where routes are and fences should be substantial to avoid trespass onto agricultural land.	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to add an additional criterion 'D' to Policy T2 (PM66) which require measures to deter public access to agricultural land.	PM66

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071016/NELNP/040/C	North East Local Nature Partnership	T2						IAMP is located on community fringes and the scale of the site should enable the development to become a local asset to all by improving connections with the landscape in the site design and delivery. To support the place making aspect of IAMP, it is important to understand the health challenges and opportunities of the workforce and local communities and to integrate these needs with aspects of park design to contribute healthier lifestyle choices whilst still contributing positively to biodiversity. Managed access onto and through the site will make an important employment site visible to local communities and for them to better understand the local employment opportunities available.	The IAMP site can be a local asset to all by improving connections with the landscape in the site design and delivery.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Design TBR (PSD13) recognises that the masterplanning of IAMP could improve connections and provide benefits to health and wellbeing. Landscape connections within one of the design objectives of the AAP.	No modification proposed
051016/TEFP/039/E	Town End Farm Partnership	T2						<p>Policy T2 encourages walking, cycling and horse riding with the aspiration being for the IAMP to be an attractive sustainable environment seeking to create and encourage pedestrian movement. The location of the Hub as identified within the (August 2016) Publication Draft to the southern boundary of the site clearly conflicts with the Policy T2.</p> <p>The Hub would be the key transport interchange as well as providing support facilities for the wider IAMP, due to these facilities being located at such a great distance 1.5 km it discourages walking and encourages the use of private modes of travel, which adds to the recirculation of traffic throughout the site adding to travel times, noise and emissions, all of which detract from the attractiveness of the IAMP as an investment.</p> <p>We object to the position of the Hub as envisaged within the draft AAP. The logical location for the Hub is to have it centrally located. We request that the Hub is relocated to a central position as envisaged, in part, by the TEF submission for phase 1 with the transport hub element similarly located close to the A19 junction. The position of the hub which was previously promoted in an early consultation document (International Advanced Manufacturing Park – Green Belt and Site Selection Options 2015) was as follows and is the logical location.</p>	The location of the Hub contradicts with Policy T2.	Request that the Hub is relocated to a central position.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Hub has been located in the south-east corner of the AAP area to allow the existing Nissan (and suppliers) site employees to access the Hub, alongside the development proposed through the AAP. In addition, the Design TBR (PSD13) explains that the location of the Hub creates a sense of place as the proposed Hub location links to the network of greenspaces and footpaths proposed, including a pedestrian and cycle route that runs alongside the edge of the development directly in to the Hub. The Transport TBR (PSD19) states that the internal road layout within IAMP will need to ensure that buses can be accommodated and the minor modifications to Policy S5 proposes that the Hub includes a multi-modal interchange and provides for small scale ancillary uses in the Northern Employment Area.	No modification proposed
260916/TWJLAF/019/A	Tyne and Wear Joint Local Access Forum	T2						Whilst generally supportive of the Area Action Plan (AAP), the forum would like to remind you of the presence of a number of Public Rights of Way in the vicinity of the proposed new development and since the proposals mean changes in the local area for people and wildlife we would hope that the potential to offer long term environmental and access improvement is designed in appropriately. This area straddling the boundary of Sunderland and South Tyneside is part of a dwindling	Support the closure of Follingsby Lane to Motorised Traffic. Take the needs of house riders and other non motorised users into account and ensure as many routes as possible	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. Policy T2 (PM66) already refers to measures to improve access within IAMP to both pedestrians and horse riders. It is proposed to modify Policy T2 to ensure that the needs of all types of users are considered when designing roads and spaces.	PM66

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								countryside within Tyne and Wear and as such is well used for recreational walking, cycling and horse riding. We are concerned that the proposed developments are likely to have an adverse impact during the years of implementation and in that regard we would like to see the closure of Follingsby Lane to motorised through-traffic a priority even if this is later relaxed for buses.	are modified to allow use for people with disabilities.			
210916/EVANS/003	Cycling UK	T4						Under A vii, please can you also include charging points for electric bicycles.		No modification proposed	The Councils propose modifications to reflect this submission. This is considered to be a minor modification to the Plan. Policy T4 (PM67) has been amended to include reference to including bicycle charging points.	PM67
260916/GC/017/H	Gateshead Council	T3						Policy T3 sets out the approach that will be taken to promote and facilitate public transport servicing the IAMP. We support the enhancement of bus services to and from the IAMP, and are keen to engage with both Councils to discuss potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.	Whilst supporting the approach set out within Policy T3 with regard to the enhancement of bus services to and from the IAMP, Gateshead Council are keen to engage with both Councils to discuss the potential links to Gateshead and the potential mutual benefits of links with the proposed Park and Ride facility at Follingsby.	No modification proposed	The detail regarding potential bus links to Gateshead will be considered as part of the DCO process, however the Councils will continue to work closely with Gateshead Council with regard to proposed public transport improvements to the IAMP.	No modification proposed
210916/NEXUS/036	Nexus	T3						Nexus is currently working with Sunderland City Council and South Tyneside Council to determine an appropriate framework of public transport options that meets the needs of this evolving development area. The provision of high quality public transport is essential to the development and sustainability of the site. It is premature to specify at this stage the exact type or frequency of service; however, the intention is to provide a compelling alternative to the use of private car for commuting purposes, and to ensure maximum integration with the existing bus and Metro network. Nexus supports the public transport measures outlined in the AAP, and looks forward to continuing to work with Sunderland City Council and South Tyneside Council and other relevant organisations as appropriate, to see these measures progressed as the IAMP is developed.	The provision of high quality public transport is essential to the development and sustainability of the site. Nexus supports the public transport measures outlined in the AAP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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210916/NISSAN/032/D	Nissan Motor Manufacturing (UK) Ltd	T4						Other items we consider should be taken into account in the consultation process is the provision of sufficient car parking within the planning provisions of IAMP and also consideration for the provision of a lorry park. Both issues have the potential to increase congestion and affect movement and design quality of the IAMP and we are aware that Sunderland City Council is reviewing lorry parking provision generally in the Washington area.	Sufficient car parking and provision for a lorry park should be considered.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Policy T4 of the AAP require sufficient provision for lorry parking to be made. In addition the Transport TBR (PSD19) provides more information about lorry parking and how parking levels within each plot will be considered.	No modification proposed
260916/IAMPLP/035/H	IAMP LLP	IN1						The emerging Masterplan for the DCO currently shows that there are works directly connected with the delivery of the IAMP that fall outside the AAP boundary as currently drawn on the Policies Map included in Appendix A. We enclose for your information the site boundary submitted to the Planning Inspectorate with the EIA Scoping Report and would highlight the following works falling outside of the current AAP boundary: Utilities and drainage connections at the western end of the A1290 and Cherry Blossom Way: The emerging utilities and infrastructure strategy for the IAMP anticipates the need for some new connections to existing infrastructure at the western end of the A1290 and linking into Cherry Blossom Way. Whilst not necessarily necessitating a change to the AAP boundary, we request that Policy IN1 and the supporting text in Section 5.5 be amended to include reference to the likely requirement for supporting utilities and infrastructure to make connections outside of the AAP boundary.	The emerging utilities and infrastructure strategy for the IAMP anticipates the need for some new connections to existing infrastructure at the western end of the A1290 and linking into Cherry Blossom Way. Whilst not necessarily necessitating a change to the AAP boundary, we request that Policy IN1 and the supporting text in Section 5.5 be amended to include reference to the likely requirement for supporting utilities and infrastructure to make connections outside of the AAP boundary.	Amend text in policy IN1 to make reference to likely supporting infrastructure and utilities and need to make connectivity out of site.	The Councils consider that there have been no soundness or legal compliance issues raised by this representation. A modification is proposed to Policy IN1 (PM68) to recognise that utility connections may need to be made with existing utilities infrastructure outside of the AAP boundary. This is considered to be a minor modification.	PM68
180816/NG/012	National Grid	IN1						National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments. National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy	National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly affect a major development or an infrastructure project of national importance. They advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The policies map demonstrates that stand off distances will be in place related to all overhead lines in relation to infrastructure and buildings. In addition, The Design TBR (PSD13) confirms that it is possible to bring forward a development that that respects the required stand-off distances required by National Grid.	No modification proposed

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								access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court.				
071016/EA/042/G	Environment Agency	IN2						We support the inclusion of policy IN2. However we would like to see an additional point within Policy IN2 to include the requirement help alleviate flood risk to downstream communities. This is supported in paragraph 100 of the NPPF, using opportunities offered by new development to reduce the cause and impacts of flooding.	Respondent requests that Policy IN2 includes the requirement to help alleviate flood risk to downstream communities.	Policy IN2 to include the requirement help alleviate flood risk to downstream communities.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP considers flood risk issues within the AAP boundary. Any further policy related to the flood risk, will be included in the emerging Sunderland and South Tyneside Local Plans. It is understood that a River Don Strategy is also being prepared for this section of the river to minimise run-off to downstream areas. The AAP's approach to sustainable water management will help to minimise downstream flooding as well as catering for upstream flows and impacts arising from development further upstream.	No modification proposed

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260916/GC/017/I	Gateshead Council	IN2						<p>Policy IN2 includes requirements to provide SuDS features within the IAMP. Criterion C requires that "...run-off from the site (post development) does not exceed corresponding greenfield rates, minimises pollution and is effectively managed with clear ownership in place". Whilst we support the principle of this policy, we consider that its requirements regarding pollution should be strengthened, by replacing 'minimises' with 'prevents'. The policy also presents an opportunity to support the multifunctional benefits of SuDS, and should require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy. A further opportunity for the IAMP to compliment the development of the South of Follingsby Lane site could be realised if policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead. This approach would support the wider catchment management and ecological connectivity of the River Don</p>	<p>Policy IN2 should be strengthened by replacing the word 'minimises' with 'prevents'. The policy should also require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy. A further opportunity could be realised if Policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead</p>	<p>Policy IN2 should be strengthened by replacing the word 'minimises' with 'prevents'. The policy should also require SuDS to provide multifunctional benefits to wildlife, landscape and water quality. The contribution of SuDS, flood mitigation measures and river restoration in supporting the enhancement of the River Don Wildlife Corridor should also be recognised within the policy. A further opportunity could be realised if Policy IN2 required off-site measures to enhance the River Don corridor westwards up to the Gateshead boundary, to integrate with activity to enhance the River Don corridor through development in Gateshead</p>	<p>A minor modification has been proposed to criterion C of Policy IN2 (PM70) to require the scheme promoter to provide SuDs to [amongst other things] provide multifunctional benefits to wildlife, landscape and water quality. Area of ongoing cooperation 1. Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.</p>	PM70
260916/NFU/028/E	National Farmers Union in the North East	IN2						<p>We are encouraged to see that the Drainage Strategy will detail future ownership and maintenance responsibilities for the various parts of the drainage network. In an area which, as evidenced by the flood maps, is prone to surface water and fluvial flooding, it is essential that responsibilities are understood at an early stage to avoid future issues. We also note that within the Green Belt and Site Selection options Paper it states that no watercourses in South Tyneside have been modelled by the Environment Agency. We would also welcome a detailed Flood Risk Assessment (FRA) and Water Framework Directive Assessment to inform the application which will hopefully enable effective water management. In the event that the flood assessment highlights the need to incorporate flood resilient infrastructure, as</p>	<p>It is essential that (flooding and drainage) responsibilities are understood at an early stage.</p>	<p>No modification proposed</p>	<p>The Councils consider there have been no soundness or legal compliance issues raised by this representation which requires modifications to the Plan. The Flood Risk and Water Management Technical Background Report (PSD15) provides information on flood risk and the proposed mitigation on site. In addition, Policy IN2 requires development proposals are accompanied by a detailed Flood Risk Assessment and Water Framework Directive Assessment.</p>	No modification proposed

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								highlighted in the site selection paper, any increased build costs should not prevent the implementation of appropriate measures. Implementation, maintenance and replacement will need to be factored in with any associated costs clearly accounted for by the promoter.				
210916/NWG/033/I	Northumbrian Water or NWG	IN2						Moving on to Section 5.6, Flood Risk and Drainage, we greatly support Policy IN2 and consider that the requirements outlined will ensure a sustainable approach to drainage on the site, particularly with regard to the use of sustainable drainage systems for surface water management and also to the need for developers to confirm that appropriate capacity exists within the foul sewerage network to accommodate flows from the site. We further welcome the supporting text to Policy IN2, which provides useful detail to guide the development of IAMP in line with the identified principles.	Support for Policy IN2	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
260916/BDWH/030/C	Barratt David Wilson Homes	EN1						Barratt David Wilson Homes is concerned that the terminology within the policy seeks to ensure that the IAMP is created and retained within a countryside setting when the scheme is already in an urban fringe location on the edge of the built up area of Sunderland and Washington and surrounded by industrial and residential development. We are concerned, as stated earlier, that elements of Policy EN1 and supporting text and evidence portray an image of the IAMP being permanently integrated into a countryside setting and requiring and ensuring maintenance of separation of settlements. This restrictive terminology could be considered to be pre-determining the outcome of the emerging Local Plan which is yet to consider locations for growth and accompanying housing allocations. The IAMP AAP therefore should be reworded to ensure that policy approaches and evidence cannot be interpreted to relate to land beyond the AAP boundary.	The respondent is concerned that the AAP requires the IAMP scheme to be created and integrated into a countryside setting, when the scheme is already in an urban fringe location. Concerned that this approach pre-determines the outcome of the emerging local plan (for Sunderland) which is yet to consider locations for growth and housing allocations.	Incorporate a landscape buffer (minimum 20m wide) around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt. Amend supporting text as follows: The policy approach seeks to minimise the impact of the IAMP on the surrounding landscape, take opportunities to enhance landscape and provide defensible boundaries for the Green Belt to prevent development sprawl. Proposed measures to reduce the visibility of the new development and mitigate development could include the use of	The Councils consider that there has been no soundness of legal compliance issues raised by this representation. Therefore there is no exceptional circumstance to justify any land to be removed from the Green Belt outside of the AAP boundary. Therefore it is appropriate for Policy EN1 to specify the need for a landscape buffer that satisfies this requirement.	No modification proposed

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										building materials, green roofs and walls, planting with large trees and use of buffers along development edges, to 'soften development' and better integrate the development with the surroundings. The landscape policy approach focuses on the protection and enhancement of the natural and built environment, including preservation and strengthening of the special character of the environment, the separation of settlements, enhancement of the landscape experience along urban fringes.		
260916/HISING/029/E	Historic England	EN1	N			N		We recognise that the AAP contains many positive proposals, including setting out principles on landscape design in policy EN1. However, again these is no mention of the historic environment, despite the supporting text referring to how the policy focuses on the protection and enhancement of the built environment.	No mention of the historic environment.	Ensure the policy is worded to offer sufficient protection to the historic environment.	Modifications are proposed to the Plan. A Statement of Common Ground (PSD8) has been agreed with Historic England to agree the modifications to the AAP that would satisfy them that AAP was made sound, and withdraw this objection. These are considered to be minor modifications to the Plan. These are proposed changes to section 2.5 IAMP Site (PM21), section 4.4.1 Masterplan Objectives (PM59), Policy D1 (PM60) and the Policies Map (PM90). In addition, changes have been agreed to the Planning Policy TBR (PSD18) and the Sustainability Appraisal Addendum (PSD5).	PM21, PM59, PM60, PM90

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290916/NATENG/038/B	Natural England	EN1						Natural England also welcomes policies EN1: Landscape design and EN3: Green Infrastructure	Support for Policy EN1	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
210916/NWVG/033/J	Northumbrian Water or NWG	EN1						It is pleasing to note that references to green infrastructure and sustainable drainage techniques continue throughout the AAP, such as the need to consider the incorporation of green and brown roofs and green walls into the design of the IAMP development within Policy EN1. These references demonstrate the commitment of the Councils to ensure the IAMP site is brought forward in a sustainable manner that maximises the many opportunities offered by such a strategic scheme.	Support for Policy EN1	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
051016/TEFP/039/F	Town End Farm Partnership	EN1						<p>The specific distances set out within both points i. & iii. (and Policy EN3) are not considered reasonable or necessary as they are overly restrictive and will conflict with the IAMP Objectives set out in paragraph 2.7.</p> <p>Policy EN1 and EN3 does not align with any of the key indicators as set out within paragraph 2.7, namely Points 5, 10 & 12.</p> <ul style="list-style-type: none"> The specific distances (EN3 i. 50 metre & ENV iii. 20 metre) would be overly restrictive to the delivery of sufficient land in the most appropriate locations to attract private sector investment. It would also conflict with the encouragement of design and development and would not ensure that opportunities are maximised to bring in both public sector and private sector funding. The TEF agree that screening and landscape buffers are important and should be identified within the AAP, but these should not be so explicit and restrictive. The intent and effective visual screening can be achieved without setting specific restrictive distances within the Policy. The intent of the Policy can still be achieved by identifying the important visual screens, which can be addressed upon submission of detailed schemes in the future. The wording of the Policy should be amended to ensure that a suitable (Proportionate) landscaping scheme is delivered. Specifically in regard to the views from the A19, a Landscape Assessment has been carried out that refers to the A19 and the impact of visual amenity: "Visual receptors likely to be less sensitive to changes in views or visual amenity (and so have lower sensitivity) include: <ul style="list-style-type: none"> People engaged in outdoor sport or recreation which does not include or depend on appreciation of views; 	The TEF agree that screening and landscape buffers are important and should be identified into the AAP, but these should not be so explicit and restrictive.	Policy EN1 i) & 111) should remove reference to specific distances, i.e. 50 metres and 20 metres, it should be amended to read: i) Minimise the visibility of the development from the A19 and maintain an effective landscape buffer along the A19. ii) No changes iii) Incorporate an effective landscaping buffer around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt. This should be reflected in the Proposal Map.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Landscape TBR (PSD 17) identifies that wide landscape buffers already line both sides of the A19 ranging from over 100m wide reducing to a pinch point of 20 m wide. It states that providing a landscape buffer along the A19 and development edges would help maintain the perception of separation between settlements and provide some screening of lower levels of the proposed development and may protect the setting of surrounding properties. Specifically incorporating a wide (minimum 50 m) landscape buffer along the A19 would maintain the appearance of separation between the IAMP site and the housing to the east of the A19, maintain amenity and soften views and provide ecological benefits. In addition the 50 metre buffer along the A19 is required to assist with managing noise and air quality matters.	No modification proposed

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								<ul style="list-style-type: none"> • People at their place of work whose attention is generally focussed on their work activities and not on their surroundings, or where the setting is not important to the quality of their working life; and • People travelling along roads where the main purpose is associated with routine day- to-day activities such as commuting, school runs, shopping or where the rate of travel means that the time exposed to the view is limited. “ (Provided by: Fairhursts, Stephen Goodchild. June 2016.) • The A19 is recognised as a visual receptor, though its importance, as set out above, is of a lower order when taken in the context of the impact of the green belt and the impact of the IAMP on its openness. • The visibility of the site is open when approached from the south for a short distance of approximately 250 metres until an existing bund rises and screens the site visually from the A19. Towards the southern end of the site it is proposed to create a landscape and wildlife corridor that runs along the length of the southern boundary with Nissan to the boundary with the A19. The depth and width at 25 metres would ensure that when approached from the A19 travelling north the site and structures on it will be screened until the southern landscaping strip is passed. The views are then interrupted again by the existing bund that would be enhanced as part of the detailed submission by [TEFP] NFTP. This would be repeated when travelling south along the A19 with only a fleeting view of the site glimpsed when travelling. • The landscaping would also be significantly enhanced at the point the bund rises above the level of the A19. The importance of landscaping at the entrance to the site is recognised at the junction of the A19 where it turns west to enter the site and the proposed landscaping would form a boulevard, creating an open, landscaped visual gateway to the Hub that is the central information point for direction to the wider IAMP and Nissan beyond. Policy EN1 i) & 111) should remove reference to specific distances, i.e. 50 metres and 20 metres, it should be amended to read: i) Minimise the visibility of the development from the A19 and maintain an effective landscape buffer along the A19. ii) No changes. iii) Incorporate an effective landscaping buffer around the development edges to integrate the development with the surrounding countryside and provide defensible boundaries for the Green Belt. This should be reflected in the Proposal Map. 				

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180916/DBCLUB/030	Durham Bird Club	EN2						<p>On behalf of the Club, I represent that specific consideration should be given to the following issues:</p> <p>a) improving the environment for Farmland birds/ground nesting species, taking into account the State of Nature Report. This should be in addition to the provision of nest boxes or swift towers which, although valuable, are perhaps tokenistic on a development of this scale.</p> <p>b) The retention and enhancement of open habitats which are currently predominant in this area. While the wooded nature of the Wear valley is mentioned in Birds of Durham, this particular area is noted more for its openness and species found here may not benefit from such habitats should they be considered, especially on a large scale.</p> <p>c) The improvement of "Blue Infrastructure" for waders & previous wetland areas. As outlined above, the Birds of Durham shows that this is an area which suits them, because of its wide open spaces and tendency to flood. In addition to Barmston Pond, there is the West Pastures site in South Tyneside which is popular with Club members. This site is north of the 'red line' of the IAMP boundary, but would be indirectly impacted upon by it.</p> <p>d) Provision for raptors and owls, including barn owl, mainly in recognition of the 'harrier corridor', running north-south through the area, as illustrated by a number of Club records over the decades/years.</p> <p>e) Special consideration of ecological connectivity (i.e. wildlife corridors), which risk being compromised by built development on this scale, including the north-south one above. This also applies to the River Don corridor itself, running east-west. Indeed, the Club represents that this is an inter-authority issue as it extends west into Gateshead, at the Follingsby South development site.</p> <p>f) The potential for brown/green roofs within the AAP should be considered to support breeding birds e.g. oystercatcher.</p> <p>g) The need for specialist management of the ecological mitigation area by a suitably qualified land manager.</p> <p>h) Consideration be given to the Priority Species of birds as now published by the NELNP.</p>	The respondent seeks specific consideration is given to : improving the environment of Farmland birds, the retention of open habitats, improvement of 'Blue Infrastructure', provision for raptors and owls, the potential for IAMP to include brown/green roofs, the specialist management of the ecological mitigation area and the needs of Priority Species.	No modification proposed	<p>The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The proposed modifications to Policy EN2 seek to maintain and enhance biodiversity and protect wildlife habitats. The supporting evidence as set out in the Ecology TBR (PSD14) recognises the contribution that the retention of open habitats would make to securing no net loss in biodiversity of the bird assemblage. The River Don corridor approach is set out in Policy EN3: Green Infrastructure and ecological approach in Policy EN2. There will be no development within 50 metres either side of the centre of the River Don (other than the construction of the bridge) which will provide additional ecological benefits within this corridor through the enhanced preservation of the land. In addition, mitigation measures that will compensate for the development of the land allocated for employment use will result in environmental enhancement and water quality benefits. Any further policy related to the River Don Corridor will be included in the emerging Sunderland and South Tyneside Local Plans. A River Don Strategy is also being prepared by public sector partners.</p> <p>Policy EN2 requires that an Ecological Impact Assessment as part of an Environmental Impact Assessment is required to support proposed development and a long term Management Plan is also required.</p> <p>Policy EN3 requires informal open spaces to provide recreational and wildlife benefits and Policy IN1 requires the provision of low carbon and renewable energy systems to be explored. Both of which could be implemented via the use of green/brown roofs.</p>	No modification proposed

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071016/EA/042/D	Environment Agency	EN2						We support the inclusion of policy EN2 However we would request a further objective of improving the WFD status in line with WFD objectives for the Don. The policy specifies the requirement for and Ecological Impact Assessment as part of the EIA, which we support. To further inform this we request reference is made to the requirement for a WFD Compliance Assessment to support any future application.	Respondent supports Policy EN2 but would like it to include a further objective improving the WFD status and require a WFD Compliance Statement.	Improving WFD status to be added to Policy EN2 and reference made to a WFD Compliance Assessment.	Policy IN2 relates to Flood Risk and Drainage. The Councils propose a modification to Policy IN2 (PM70) to reflect this submission. This is considered to be a minor modification. Part C of Policy IN2 is proposed to be amended to ensure that run off from the site (post development) provides benefits to water quality. In addition the proposed Monitoring Framework includes 'Water Quality Indicators for the River Don' as a target/outcome for Policy IN2. The Councils do not consider it to be necessary to include reference to a WFD Compliance Assessment in the policy as it is separate requirement. All required assessments will be submitted prior to development of the site.	PM70
260916/GC/017/J	Gateshead Council	EN2						<p>Policy EN2 seeks to establish policies which will protect and enhance the ecological value of the IAMP. As referred to in our comments relating to draft AAP policies D1 and IN2, the River Don corridor provides a valuable shared ecological resource which spans areas of Gateshead, South Tyneside and Sunderland. The mobile nature of protected species also means that development within the IAMP has potential implications for biodiversity within Gateshead. In this respect, Gateshead Council would support a strong policy approach to protecting and enhancing Local Wildlife sites and ecological connectivity through development of an IAMP. We recognise that policies of the AAP will be applied alongside those contained elsewhere in the Councils' respective Local Plan documents.</p> <p>However, we would support revisions to the wording of policy EN2 to provide a more robust policy approach requiring the protection and enhancement of ecological assets through development of the IAMP.</p> <p>Supporting text to policy EN2 states: "Priority will be given to mitigating effects [on ecological assets] within the IAMP boundary, however in certain cases it may be necessary to provide offsite mitigation". In our view it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don corridor is to be protected, and this should be made clear within policy EN2.</p>	Gateshead Council would support revisions to the wording of policy EN2 to provide a more robust approach requiring the protection and enhancement of ecological assets through development of the IAMP. In Gateshead Council's view, it will be necessary to provide offsite mitigation if the ecological connectivity along the River Don corridor is to be protected, and this should be made clear within policy EN2	Would support revisions to the wording of policy EN2 to provide a more robust policy approach requiring the protection and enhancement of ecological assets through development of the IAMP.	<p>Minor modifications have been proposed to Policy EN2 (PM76) to require the proposals to maintain and enhance biodiversity and protect wildlife habitats by [amongst other things] maintaining and enhancing the River Don as a functional ecological corridor.</p> <p>Area of ongoing cooperation</p> <p>1. Gateshead Council, South Tyneside Council and Sunderland City Council aim to provide measures within their emerging Local Plans that will enhance the water quality of the River Don, and protect and enhance ecological connectivity along its corridor.</p>	PM76

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260916/NFU/028/F	National Farmers Union in the North East	EN2						While we acknowledge the further details will be provided in an Ecological Impact Assessment. We are yet to see details showing the impacts upon land need (and its availability) to offset any loss or if land in the local area is available or suitable to offset and archive net gains.	Yet to see details showing the impacts on land needed to offset any loss.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The Ecology TBR (PSD 14) sets out the need to consider net gains for nature and Policy EN2 requires that development proposals are supported by an Ecological Impact Assessment.	No modification proposed
290916/NATENG/038/A	Natural England	EN2						Natural England welcomes Policy EN2: Ecology. We are aware of the environmental workshops that are taking place with regards to the IAMP and the AAP seems to reflect the intentions on biodiversity. However, even though the text in section 6.2 on Ecology (p 29) mentions the enhancement of the ecological value of the IAMP, Policy EN2 limits itself to maintaining and protecting wildlife habitats. In line with NPPF paragraph 109, we advise to reword policy EN2	Policy EN2 should refer to the need to enhance biodiversity.	Reword Policy EN2 'To maintain and enhance biodiversity and protect and enhance wildlife habitats'	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy EN2 (PM76) to refer to both maintaining and enhancing biodiversity and protecting wildlife habitats.	PM76
071016/NELNP/040/B	North East Local Nature Partnership	EN2						Notwithstanding there are several ecologically sensitive features spread across this landscape, thoughtful and extensive use of high quality blue and green infrastructure to minimise the impact of development can ensure that the scheme becomes an exemplar in terms of enhancing the natural environment whilst facilitating delivery of significant inward economic investment.	Thoughtful and extensive use of high quality blue and green infrastructure can ensure the scheme becomes an exemplar.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which requires modifications to the Plan.	No modification proposed
071016/EA/042/H	Environment Agency	EN3						We welcome policy EN3 and in particular point i. To incorporate a minimum 50m wide buffer along the River Don linking with the wider area Green Infrastructure Corridor. With IAMP and the nearby Follingsby development there is an opportunity to enhance habitats, habitat connectivity and provide opportunities to improve water quality and reduce flood risk. The current mitigation zone within the IAMP site along the River Don extends to the edge of the western site boundary, we request that this is amended to extended further along the River Don and connect to the proposed Follingsby development upstream where there are plans for further ecological mitigation along the Don. In doing so this will maximise the environmental benefits for these developments and help realise the River Restoration ambitions.	Respondent requests that the ecological mitigation zone along the River Don is extended further along the River Don and connects to the proposed Follingsby Lane development upstream.	Request that the ecological mitigation zone is amended to extended further along the River Don and connect to the proposed Follingsby development upstream where there are plans for further ecological mitigation along the Don.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The IAMP boundary can only legislate policy within the IAMP boundary. The existing and emerging Sunderland and South Tyneside Local Plans provide policy for the area outside of the IAMP AAP and can consider how to align with the approach taken within the AAP area and at Follingsby. In addition, SCC and STC are part of the River Don Partnership.	No modification proposed

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290916/NATENG/038/C	Natural England	EN3						Natural England also welcomes policies EN1: Landscape design and EN3: Green Infrastructure	Support for Policy EN3	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
210916/NWG/033/C	Northumbrian Water or NWG	EN3						We further welcome subsequent reference to maximising benefits from natural assets such as the River Don and the associated corridor of green infrastructure. An integrated approach to surface water management can produce multiple benefits spanning flood risk, water quality, ecological benefit and amenity value.	Welcome reference to maximising the benefits of the River Don	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
170816/WANLESS/005	Danielle Wanless	EN4						I would like to express my concern in regards to the IAMP proposal & the site of construction. I live on the outskirts of Town End Farm and I am concerned that the construction will have a negative impact on my street and surrounding neighbourhood, not only during the building process but in the long term, i.e., noise, traffic, the appearance of the IAMP. Please consider the resident if this goes ahead, but I would prefer if this was built elsewhere.	Concerned that the construction of IAMP will have a negative impact on my street and surrounding neighbourhood.	No modification proposed	The Councils consider that there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP policy on amenity (policy EN4), requires the impact on surrounding residents to be considered and seeks to minimise disturbance. It requires proposals to provide mitigation measures to minimise the impact of the development on the local environment and amenity.	No modification proposed
260916/NFU/028/G	National Farmers Union in the North East	EN4						While we are pleased to see any IAMP impacts upon the surrounding area are considered, what assessment has been made of possible conflict (traffic, odour, noise, etc.) from surrounding agri-business and communities as the development extends into the Green Belt. We are concerned that the future of agri-business to develop or diversify may be limited by the proximity of the IAMP.	Concerned that the future of agri-businesses to develop or diversify may be limited by the proximity of IAMP.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The potential ability for land use outside the AAP area to develop will be determined in accordance with the development plans for Sunderland and South Tyneside.	No modification proposed

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220916/CCE/018/A	Church Commissioners for England	Del 2						<p>The Commissioners have extensive land and minerals holdings in the wider South Tyneside and Sunderland City Council areas and a significant portion of their land and minerals ownership has been included in the IAMP proposal, as both development and mitigation areas, The Commissioners support and welcome the general concept and location of the proposal but have some concerns and reservations about the detail contained within the Draft.</p> <p>Within the Draft, there is little evidence to support both the extent of development area and, particularly the extent of mitigation area. Given the amount of land included within the site boundary, there is a low proportion of area outlined for development with significant mitigation proposed, which appears to be in excess of that ordinarily required for the extent of development outlined. We would welcome understanding the evidence base to support these proposals further.</p>	The respondent supports and welcomes the general concept and location of the proposal but has some concerns and reservations about the extent of the developments area and particularly the extent of the mitigation area. Furthermore, the respondent supports the justification for the amount of the mitigation area.	No modification proposed	The Councils consider there are no soundness or legal compliance issues raised by this representation which require modifications to the plan. Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Policy EN2 of the AAP aligns with this approach. The Ecology TBR (PSD15) sets out the species that are present in the AAP area and recommends that these species are accommodated in the AAP area where possible. It also advises that net gains for biodiversity are secured. This could be achieved through the quality or quantity to ensure a net gain. The area shown as the Ecological and Landscape Mitigation area on the IAMP AAP Policies Map is where mitigation should be provided. It is expected no net loss calculations in accordance with the DEFRA methodology will be undertaken to inform the exact extent of the mitigation required for the development scheme submitted for approval. This land remains within the Green Belt.	No modification proposed
260916/NFU/028/H	National Farmers Union in the North East	Del 2						The plan states that 'developer contributions may be appropriate to fund measures to mitigate the impact of the development on the environment' and 'similarly, it is possible that a proportion on environmental mitigation could be delivered directly by the promoter within the IAMP AAP area'. We would like to see these commitments clearly defined at an early stage to ensure environmental mitigation is effective in compensating for the loss of green belt land. Furthermore, mitigation should be future proofed so that they do not disadvantage surround agri-business. Similarly, any developer contributions should also be defined early in the process.	Developer contributions should be defined early in the process and be future proofed to not disadvantage surrounding agri-businesses.	No modification proposed	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. It is proposed to modify Policy Del2 (PM85) to provide clarity that mitigation required will be secured through the DCO, planning conditions or planning obligations.	PM85
071016/EA/042/I	Environment Agency	IPS Table 1						We support river channel improvements and consider these are informed by the River Restoration Study currently being undertaken by the River Restoration Centre.	Respondent supports the reference to the River Chanel Improvements as set out in the IDS.	No modification proposed	The Councils consider that there has been no soundness or legal compliance issues raised by this representation. It is proposed that the Infrastructure Delivery Plan is removed from the AAP (PM89) and now forms a stand alone document (PSD 21). River Chanel works remain within this document as reference item no 3.	PM89

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260916/HARWORTHSTATES/025/A	Harworth Estates	IDS Table 1				N	N	<p>My clients, Harworth Estate, believe that there must be vehicular access for private car and HGV's, connecting the eastern side of the IAMP to the existing industrial and commercial facilities at Follingsby Industrial Park and Wardley. It is acknowledged that Follingsby Lane may not wide enough to be this link however it should be upgraded or replaced as part of the infrastructure work required to facilitate the IAMP. This work should be done at the start of the project (2019) rather than being left to come forward at a later stage. Table 1, reference point 6, states that the proposed scheme will include for Follingsby Lane to become a bus route and cycleway only. It is assumed that this will be part of the main infrastructure works, programmed to start in 2019. The Transport Technical Background Paper (TP), which forms one of the background documents for this Area Action Plan (AAP), identifies that Follingsby Lane is not suitable as a viable means of access to the IAMP due to the current nature of the road and the bridge over the River Don.</p> <p>It is noted that in paragraph 3.5.1 of the TP a concern has been raised that it would provide an attractive through route for traffic from the A194 to the A19 leading to unrelated IAMP traffic causing congestion locally. Follingsby Lane, at its western end, already provides access to the Follingsby Lane Industrial Estate, and a proposed extension to this Estate has been identified in the Newcastle/Gateshead UDP, as well as the existing consented Wardley site. The Wardley site, which is owned by my clients Harworth Estates, is identified in South Tyneside's latest consultation draft of the Local Plan as a potential employment site. Therefore, to limit vehicular traffic to buses only along the full length of Follingsby Lane will have a direct negative impact on these existing and proposed sites. I therefore assume that the proposal is to restrict the use of Follingsby Lane to buses only at the point at which it enters the IAMP area.</p> <p>The concern that has been noted in the TP that the existing Follingsby Lane may become a back route between the A194 and A19; this is not considered realistic. Heavy goods wagons cannot use Follingsby Lane at the moment because of the weight restriction on the bridge. I am not aware that the Lane has not been used intensively as a link between these two roads and there is no reason to believe why it should do in the future. It is noted that the overall Masterplan for the site does include new proposed key roads. These key roads will potentially result in a road linkage leading from the IAMP to Follingsby Lane in the vicinity of Strother House Farm. If the use</p>	<p>To limit vehicular traffic to buses only along the full length of Follingsby Lane will have a direct negative impact on these existing and proposed sites. It is noted that the overall Masterplan for the site does include new proposed key roads. These key roads will potentially result in a road linkage leading from the IAMP to Follingsby Lane in the vicinity of Strother House Farm. If the use of Follingsby Lane is simply restricted to buses and it is replaced by a new distributor road, then Harworth Estates would support such a proposal. However, if Follingsby Lane is closed to vehicular traffic, without any replacement then this cannot be supported. Not providing a link between the existing Follingsby Estate and the IAMP fails to acknowledge the interrelationship between these two important industrial areas. To restrict the vehicular access between the existing sites and the IAMP will result in two isolated commercial developments and this cannot be viewed as 'positive planning'. Therefore, either the upgrade or replacement of Follingsby Lane must be included as part of this Area Action Plan and it must be included within</p>	<p>Our view is that Table 1, reference point 6, should be amended to include the upgrade or replacement of Follingsby Lane in order to provide the vehicular linkages between the existing commercial and industrial sites and the IAMP.</p>	<p>The Councils consider that there have been no soundness of legal compliance issues raised by this representation. The location of proposed key roads within the IAMP AAP area are shown on the Policies Map and access into the site to these roads is via the A1290 and A19. The Transport TBR (PSD19) highlights that vehicles travelling from Follingsby Industrial Park will be able to again access to the IAMP via the A184 and A19. Junction improvement measures being implemented by Highways England at Testo's and Downhill Lane are forecast to notably improve journey times for this route. This means that links between the two locations will be via an appropriate network and improved journey times.</p>	<p>No modification proposed</p>

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								of Follingsby Lane is simply restricted to buses and it is replaced by a new distributor road, then Harworth Estates would support such a proposal. However, if Follingsby Lane is closed to vehicular traffic, without any replacement then this cannot be supported. Not providing a link between the existing Follingsby Estate and the IAMP fails to acknowledge the interrelationship between these two important industrial areas. The IAMP is identified as concentrating on automotive and advanced manufacturing sectors for production, supply chain and distribution activities (Policy S3) and specifically any other uses need to have a link to the IAMP or not be detrimental to the operation or principle of its use (Policy S3B). Therefore, other B2 and B8 industrial developments which may benefit from being in such an area may need to be located on sites that are not within the IAMP but are located in close proximity. This could include energy uses or waste uses that have a direct relationship to the IAMP by taking waste or providing power but are better located away outside the IAMP itself. Therefore, the further development of Follingsby and the potential development of Wardley offers an ideal opportunity to provide commercial floor space for a whole range of activities that are not directly related to the IAMP but will benefit from direct linkages to the site. To restrict the vehicular access between the existing sites and the IAMP will result in two isolated commercial developments and this cannot be viewed as 'positive planning'. Therefore, either the upgrade or replacement of Follingsby Lane must be included as part of this Area Action Plan and it must be included within the first phase of the infrastructure works.	the first phase of the infrastructure works.			
071016/EA/042/J	Environment Agency	MF Table 2						We support the AAP objectives, we would advise however that objective 12 is expanded to include reference to improving flood alleviation to downstream communities. We would recommend that the water quality and habitat connectivity element to objective 12 could be a separate objective with the inclusion of achieving WFD objectives .	Expand Objective 12 to include reference to improving flood alleviation to downstream communities.	Recommend that the water quality and habitat connectivity element to objective 12 could be a separate objective with the inclusion of achieving WFD objectives. Propose objective 12 is expanded to include reference to improving flood alleviation to downstream communities.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Policy IN2 requires development proposals to be supported by a detailed Flood Risk Assessment. In addition, the emerging Local Plans for Sunderland and South Tyneside will appropriately consider the future allocation of land in their local authority areas informed by their strategic flood risk assessments.	No modification proposed

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071016/EA/042/K	Environment Agency	MF Table 2						A target/indicator of policy EN2 could be that there is no deterioration of the River Dons WFD status.	Include a target/ indicator for Policy EN2 relating to no deterioration in the River Dons WFD status.	Recommend no deterioration of the River Don's WFD status is a target/ indicator for Policy EN2.	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. A modification is proposed to the AAP to update the Monitoring Framework. This is considered a minor modification. The proposed Monitoring Framework (PM94) includes 'Water Quality Indicators for the River Don' as a target/ outcome for Policy IN2.	PM94
290916/NATENG/038/F	Natural England	SA						<p>We concur that there are potential significant impacts on biodiversity and habitat, particularly in the vicinity of the River Don.</p> <p>As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the AAP. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). In addition, the report refers to mitigation that is in place, namely "Objective 13 specifically gives consideration to water quality and habitat connectivity along the River Don". However, there are no indicators that address these impacts specifically.</p> <p>The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions. Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate:</p>	Recommends additional/ alternative indicators for the Sustainability Appraisal	<p>Biodiversity:</p> <ul style="list-style-type: none"> Any adverse impacts on sites of acknowledged biodiversity importance as a result of the development and related planning permissions; Overall biodiversity enhancement/hectares of biodiversity habitat delivered as a result of the development and related planning permissions. Improvements in water quality of the River Don as a result of the development and related planning permissions. <p>Green infrastructure:</p> <ul style="list-style-type: none"> Changes to the percentage of the city's population having access to a natural greenspace 	The Councils have updated the monitoring framework of the Sustainability Appraisal Addendum (PSD5) to reflect Natural England's advice.	A modification has been made to the SA Addendum.

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										<p>within 400 metres of their home as a result of the development and related planning permissions;</p> <ul style="list-style-type: none"> • Length of greenways constructed; <p>Changes in hectares of accessible open space per 1000 population.</p>		

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290916/NATENG/038/E	Natural England	HRA						Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.	Natural England concur that the proposal can be screened out from further stages of Habitat Regulations Assessment.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed

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260916/BDWH/030/D	Barratt David Wilson Homes	PM						<p>Barratt David Wilson Homes is concerned that the IAMP AAP incorporates a large area of residual Green Belt land which is unnecessary for the implementation of the IAMP itself. The role and function of some of this residual Green Belt could be further considered through the emerging Local Plan when the consideration of housing options will be determined. We consider it would be prudent in such circumstances where the progression of the IAMP AAP is so far ahead of the Local Plan that the IAMP AAP has a tightly drawn boundary. We are concerned also that the new Green Belt boundary does not accord with national guidance and does not utilise clear and recognisable features. Of particular concern is the area of land around West Moor Farm where the new boundary appears to dissect several fields along an undefined transect, which appears to be a line of pylons and are not permanent features for the long term given the ability to move such objects. We believe a robust approach would be to utilise and reinforce the existing features, such as field boundaries, rather than create new ones. Furthermore, the Ecological Technical Background Paper appears to suggest that the area around West Moor Farm has some ecological interest, therefore it would be more appropriate to exclude West Moor Farm from the IAMP and associated AAP boundary. The illustration below (Figure 1) suggests a new western boundary which utilises field boundaries and existing tracks and as such fully accords with national guidance. The AAP boundary has been similarly reduced to only incorporate that which is necessary to deliver the IAMP. It is important that the AAP should be drafted in a manner in which the possibility for housing on land adjacent to the AAP and the IAMP can still be explored through the emerging Local Plan. The Green Belt Review and the IAMP Green Belt and Site Selections Options Paper (November 2015) concludes that the "Green Belt separation between Washington and Sunderland has already been compromised due to the existing employment land that adjoins the two areas" and "this land represents a sustainable location within the centre of the Tyne and Wear conurbation and has been identified by the Secretary of State as having the potential to deliver a strategic development". There are therefore, "exceptional circumstances to consider this entire area further". This is shown clearly in Figure 2 above which is extracted from the Site Selection Paper and highlights that the land on the eastern edge of Washington and the fields that border the A1290 serve little or no Green Belt purpose and can be mitigated. This conclusion is not fully reflected within the AAP as some of this land is included within the AAP boundary as Green Belt but not part of the IAMP proposals. This then leads to the question if it is shown in the</p>	<p>The respondent is concerned that the AAP incorporates a large area of residual Green Belt area, the role and function of which could be considered in emerging Local Plan (for Sunderland). Concerned that the new Green Belt Boundary does not accord with national guidance and does not utilise clear and recognisable features. The respondent considers that the new boundary follows a line of pylons are not a long term feature given the ability to move these objects. The respondent proposes an alternative Green Belt Boundary that follows field boundaries instead of the pylons. The AAP should be drafted to allow for the possibility for land adjacent to the AAP and the IAMP can still be explored through the emerging Local Plan.</p>	<p>Amend AAP boundary . The AAP Boundary should be tightly drawn and not include land which is unnecessary for IAMP as per submitted 'Figure 1;</p>	<p>The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. The AAP boundary does include land to be retained within the Green Belt. The Policies Map also shows that this land is indicative as an Ecological and Landscape Mitigation Area. This use is compatible with land retained within the Green Belt. This is necessary to ensure that there are 'net gains for nature' when IAMP is delivered. As there is no National Policy Statement for Business and Commercial Uses, the AAP provides a policy framework which enables development and ensures that this is mitigated and the extent of the AAP boundary is such to enable this policy approach to be applied. In accordance with NPPF paragraph 88, the Councils have demonstrated that there is an exceptional circumstance within the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (PSD12) to remove 150 hectares of land from the Green Belt. In accordance with NPPF paragraph 52, the Councils have defined a new Green Belt boundary using existing physical features.</p> <p>Paragraph 85 of the NPPF states that Local Planning Authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The revised Green Belt boundary only removes land for development purposes and retains a Green Belt corridor from east to west. The AAP boundary includes land for development and mitigation. As shown on the policies map, land allocated as green belt will also be used for ecological and landscape mitigation. It is considered that pylons are a readily recognised physical feature. In addition National Grid's response to the Regulation 19 consultation (REF: 180816/NG/012) states that National Grid only supports the relocation of high voltage overhead lines where this would directly facilitate a major development or infrastructure project of national importance. Whilst IAMP is such a project, the Design TBR (PSD 13) confirms that it is possible to develop the IAMP proposal and allow for the required stand off distance from</p>	<p>No modification proposed</p>

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								IAMP AAP as Green Belt can it be considered for residential when the wider plan is reviewed, particularly as the Green Belt Review considered the land serves little or no Green Belt purpose and its release in the future would complement the IAMP proposals. We have therefore proposed some suggested amendments to the AAP boundary to ensure land to the east of Washington is able to be fully considered through the Local Plan Review without risk of transcending into the AAP boundary. The AAP boundary should therefore be tightly drawn and not include land which is unnecessary for IAMP, as this would allow for the purpose of that land to be considered through the emerging Local Plan which is considering housing land allocations. The proposals for the IAMP on land adjacent to Nissan are a step change in aspirational economic growth and to truly capture its value for the Sunderland economy associated aspirational housing should be planned in the locality. The Arup report on housing for IAMP identifies that the scheme will generate the need for at least an additional 523 new homes but could be up to above 2,600 new homes. We believe that land in Washington adjacent to the IAMP proposals is the most appropriate location for new housing related to the proposals. This approach reflects the Green Belt Review which concludes the land adjacent to that which is now being proposed for the IAMP does not perform a strong Green Belt function and is able to be removed from the Green Belt. The location of aspirational family housing adjacent to the IAMP would benefit Sunderland and the wider economy with good linkages to the south and north and its proximity to existing and proposed employment sites. There is the opportunity with the IAMP to create a sustainable urban extension delivering hi-tech jobs and aspirational family housing. There should therefore be a focus for growth towards Washington to take advantage of the IAMP proposals.			these pylons without the need to relocate them. This will ensure the permanence of this feature.	
260916/HISING/029/F	Historic England	PM	N					As noted above, the Policies Map – while identifying locally important wildlife sites – has failed to identify the nationally important Grade II listed asset in the centre of the site, which is a major omission.	Policies Map has failed to identify the nationally important Grade II listed asset in the centre of the site.	Update the policies map to include the Grade II listed bridge on site.	It is proposed to amend the Policies Map (PM90) to identify Hylton Grove Bridge (Grade II Listed). The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan.	PM90

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260916/IAMP/LLP/035/I	IAMP LLP	PM						The emerging Masterplan for DCO currently shows that there are works directly connected with the delivery of the IAMP that fall outside the AAP boundary as currently drawn on the Policies Map included at Appendix A. We enclose for your information the site boundary submitted to the Planning Inspectorate with the EIA Scoping Report and would highlight the following works falling outside of the current AAP boundary	There are utilities and infrastructure works proposed by IAMP LLP that fall outside the AAP boundary.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
210916/NWG/033/D	Northumbrian Water or NWG	PM						We consider that whilst the AAP policies map does give some additional detail on location of development with the wider site, further consultation once specific information is available will allow us to provide a more detailed response in relation to sewerage network and sewage treatment capacity relevant to inform drainage design.	When more specific information is available on the location of development on site, this will allow a more detailed response in relation to sewerage network and sewage treatment capacity relevant to inform drainage design.	No modification proposed	The Councils consider there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan.	No modification proposed
220916/SE/022	Sport England	PM						<p>We are dismayed to note that the neither the policies map nor the plan acknowledges that the plan area includes a playing field site (located immediately north and east of the Aircraft Museum). Had the playing field's existence been acknowledged, then the AAP should then have gone on to consider how development could proceed whilst satisfying paragraph 74 of the NPPF and Sport England's playing field policy. Unfortunately the AAP ignores the playing field's existence and the policy implications thereof.</p> <p>As such Sport England wishes to object to the AAP. Sunderland's Playing Pitch Strategy 2015 is an adopted Council strategy to which the AAP should have had regard to its detail in its preparation. The PPS describes the number of pitches on the playing field and the teams that use them. The PPS also provides an indication as to the current and likely future adequacy of pitch capacity against demand across a range of sports / age groups.</p> <p>If it is not proven that there is a surplus of playing pitches (across all sports and age-groups) in this part of Sunderland when the land comes forward for development then it will be necessary to replace the playing field in accordance with Sport England's playing field policy exception E4 and NPPF para 74. Until the policies of the AAP are framed to recognise this constraint and are in line with the above requirement, then it will be necessary for Sport England to sustain its objection.</p>	Neither the policies map, nor the plan, acknowledges that the plan area includes a playing field site. The AAP does not consider how development could proceed whilst satisfying paragraph 74 of the NPPF and Sport England's playing field policy; and the AAP should have had regard to the detail contained within Sunderland's Playing Pitch Strategy 2015 in its preparation.	The Policies of the AAP are framed to recognise this constraint.	The Councils propose a modification to reflect this submission. This is considered to be a minor modification to the Plan. The supporting text of the AAP has been updated (PM21 and PM41) to acknowledge the presence of the playing fields and to explain that the Playing Fields should be retained on the site until deemed surplus to requirements in consultation with Sport England (PSD8).	PM21 PM41