IAMP AAP Publication Draft: Schedule of Proposed Main Modifications and Proposed Changes to the Policies Map -September 2017

Under section 20(7C) of the 2004 Act, the Councils have requested the appointed Inspector to recommend any main modifications to the plan (Document PSD1) that are necessary to make it sound and legally compliant.

The modifications set out in this schedule include ones proposed by the Councils at the time of submission of the plan for Examination (Document PSD7) and further modifications proposed in the light of discussion at the hearing sessions and additional evidence which has been prepared.

Main Modifications

The modifications are set out in Plan order. Where it has not been possible to show information (such as tables, diagrams and maps) within the table, these are provided in Appendix 1.

The following format has been used to denote modifications:

Strikethrough text = text proposed for deletion Underlined text = new text proposed

Proposed Changes to the Policies Map

The schedule also lists proposed changes to the Policies Map to ensure its consistency with the proposed main modifications.

MM Ref	Page (August 2016 Publication Draft)	Policy or Paragraph (August 2016 Publication Draft)	Policy or Paragraph (August 2017 Version)	Proposed Changes (to the August 2016 Publication Draft)	Justification for Proposed Modification
MM1.	Front Cover		Front Cover	International Advanced Manufacturing Park Area Action Plan 2017-2032 Cover image to be updated.	Clarify plan period and title of the document. Insert date of adoption.
MM2.	(Inner front page)		Inner front page	Publication Draft August 2016 MMM YYYY Public consultation on this publication draft Area Action Plan (AAP) will take place between 1 August and 26 September 2016.	Insert full date of adoption.
				Formal representations and comments received will be taken into consideration, prior to the draft AAP being submitted to the Planning Inspectorate for independent examination. If declared 'sound' and fit for purpose, the final IAMP AAP will be adopted by Sunderland City Council and South Tyneside Council as part of their respective Local Plans. Local Plan Development Plan Document adopted by Sunderland City Council and South Tyneside Council on DD MMM YYYY	To include a foreword to set the context for IAMP to clarify floor space, size of site and jobs.
				Foreword <u>"As neighbouring councils, we recognise the importance of working in</u> <u>partnership to create growth and opportunity in Sunderland and South Tyneside</u> for many generations to some	
				for many generations to come. Our commitment to the delivery of an International Advanced Manufacturing Park (IAMP) that spans our boundaries is based on the knowledge that this will significantly grow our economies. Through the delivery of the IAMP, on the land north of Nissan, we want to build on our strengths in automotive and advanced manufacturing and increase opportunities for enterprise and employment both here and in the wider region.	
				In Nissan we have the largest and most productive automotive plant within Europe, producing over 500,000 cars each year, and the IAMP will support this with 260392,000 square metres of floorspace over a 100 150 hectare site. We anticipate circa 5,2007,850 jobs being created across the advanced manufacturing and automotive sectors with companies that will benefit from being close to Nissan and from the infrastructure and skilled workforce that exists here.	
				This IAMP Area Action Plan has been prepared jointly by our councils to establish the planning policy framework that is needed to successfully deliver the IAMP. It takes into account the development's surroundings, the infrastructure and safeguards needed and the sustainability of the IAMP. Aside from being of utmost importance to Sunderland and South Tyneside, the development of the IAMP links to the North East Local Enterprise Partnership's Strategic Economic Plan and has been designated as a Nationally Significant	
				Infrastructure Project (NSIP) by Government. Our vision for the IAMP, as described in this Area Action Plan, is one shaped by evidence, ambition and extensive consultation with residents, business and partners. In IAMP we see a hugely significant opportunity for the region and indeed the whole UK."	
MM3.	Headers		Headers	Publication Draft	Update for adopted version
MM4.	Contents		Contents	Update as necessary	For consistency with adopted version
MM5.				Department of Business, Innovation and Skills Department for Business, Energy & Industrial Strategy Durham Biodiversity Action Plan Department of Environment, Food and Rural Affairs Enterprise Zone European Union	
				Flood Risk Assessment Northumbrian Water Ltd Price Waterhouse Coopers	
				Statement of Community Involvement Local Highways Authority Local Planning Authority	
				Landscape and Visual Impact Assessment Local Wildlife Site	
MM6.	2	1.1 Para.1	1	related advanced manufacturers to innovate and thrive,. The IAMP will contributeing significantly to the long-term economic success of the North East of England and the national automotive sector.	Typographical error
MM7.	2	1.1 Para.2	2	The IAMP is located on land to the north of Nissan's existing car manufacturing plant, located within the administrative areas of Sunderland and South Tyneside.	Clarity
MM8.	2	1.1	3	The IAMP Area Action Plan (AAP) Publication document has been prepared is a	For clarity

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		Para.2		policy framework to guide the comprehensive delivery development of the IAMP_through development of the land to the north of Nissan's existing car manufacturing plant, located within the administrative areas of Sunderland and South Tyneside. The AAP sets out planning policies to direct and enable the comprehensive development delivery of a high quality, employment development site which is targeted at automotive and advanced manufacturing end users, and their supporting facilities.	
MM9.	2	1.1 Para.3	3	The IAMP_AAP has been prepared Sunderland City Deal (in partnership with South Tyneside) (hereby referred to as the City Deal).	For clarity
MM10.	2	1.1 Para.4	4	The IAMP AAP is a plan for the next 15 years <u>(covering the period 2017 to</u> <u>2032)</u> . The AAP sets out planning policies to direct and enable the comprehensive delivery of a high quality, employment development which is targeted at automotive and advanced manufacturing end users, and their	For clarity and to reflect plan period
MM11.	2	1.1 Para.5	5	supporting facilities. The IAMP was designated by the Secretary of State as nationally significant. a Nationally Significant Infrastructure Project (NSIP) in September 2015. That means that the IAMP proposal itself, within the designated boundary for the Nationally Significant Infrastructure Project (NSIP) in September 2015. That Means that the IAMP proposal itself, within the designated boundary for the Nationally Significant Infrastructure Project (NSIP), must be implemented authorised by a Development Consent Order (DCO) under the Planning Act 2008. The Councils intend to submit their application for a DCO application is expected to be submitted during 2017.	For clarity and to reflect changing circumstances
MM12.	2	1.1 Para.7		The IAMP AAP Publication document is the final draft version of the IAMP AAP. It has been made available for consultation to the Planning Inspectorate. This is a formal opportunity for the local community and other interested stakeholders to consider the IAMP AAP. If the Planning Inspectorate finds the IAMP AAP to be 'sound', it will be adopted by the Councils. Once adopted, the IAMP AAP will form part of the statutory Local Plans for both Sunderland City Council and South Tyneside Council.	Superseded by events
MM13.	2	1.1 Para.8		The IAMP AAP Publication document have been published alongside the Sustainability Appraisal which has informed the development of the IAMP AAP to ensure it fully considers all opportunities to promote sustainable development.	Superseded by events
MM14.	2	1.1 Para.9		The IAMP AAP is also accompanied by a series of Technical Background Reports and other technical evidence base documents which have informed the preparation of the IAMP AAP. The supporting evidence documents for the IAMP AAP can be found at: www.sunderland.gov.uk/iamp development-plan www.southtyneside.gov.uk/localplan	Superseded by events
MM15.	3	2.1 Para.1	7	The IAMP AAP provides the planning policy <u>framework_context</u> for the <u>comprehensive development_delivery of a development comprising of</u> approximately 260392,000sqm of floorspace for <u>principal and related supporting</u> <u>uses. Principal uses are defined as production, supply chain and distribution</u> <u>activities directly related to the Automotive and Advanced Manufacturing</u> <u>sectors.automotive and other advanced manufacturing, engineering and related</u> <u>distribution businesses</u> . This would be delivered on a site of <u>100150ha</u> . In addition, 50ha of land is safeguarded for possible future developments of these <u>uses and 135110ha</u> of <u>adjacent</u> land would be retained for ecological and landscape mitigation. This <u>Mitigation Aarea</u> would not be developed but <u>and</u> remain in the Green Belt.	For clarity and consistency to reflect changes to floorspace and approach top safeguarded land.
MM16.	3	2.1	8	The site is identified by the IAMP AAP site boundary <u>and is shown</u> in Figure 1.	For clarity and consistency
MM17.	3	Para.2 2.1 Para.3	9	The <u>P</u> policies <u>M</u> map (Appendix A) presents the sub-areas for the <u>illustrates the</u> IAMP policy allocations and designations, including; IAMP AAP including :	For clarity
MM18.	3	2.1 Para.3	9	 the ancillary commercial, leisure and transport local centre area known as 'the Hub' located in the southern part of the site; the extensive ecological and landscape mitigation zone; and and the road, cycle and public rights of way networks across the AAP area. 	To address comments raised by 260916/WGPTDTBB/023/G on the local centre. Grammatical changes made
MM19.	4	2.2 Para.1	10	The development of the IAMP will underpin the continued success of the automotive and advanced manufacturing sectors in the UK and <u>the North East</u>	For clarity
MM20.	4	2.2	11	of England.Nissan is a major employer in the North East of England and In addition,in the North East of England region there are 25 tier one automotive suppliers,with over 7,000 people employed in Sunderland's Nissan plant which in turnunderpinsning over 20,000 supplier jobs in the wider North East region.	For clarity
MM21.	4	2.2	12	Projects such as the IAMP are	Grammatical
MM22.	4	2.3 Para.1	13	 The study identified the requirement for the IAMP (which was confirmed through the Sunderland City Deal). (in partnership with South Tyneside) in June 2014) of: Oover 260,000 sq m of developable floorspace over a 100ha advanced manufacturing park; and Ccreating circa over 5,200 new jobs with the vast majority within the 	For clarity and reflect changes to approach
MM23.	4	2.3	15	manufacturing sector. The Department for Business, Innovation and Skills (BIS) The Automotive	For clarity and consistency. To
		Para.3		Strategy (produced by the then Department for Business, Innovation and Skills)	reflect the merger of the

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				estimates that supply chain production worth £3-4bn could be brought within the UK. <u>In October 2016</u> Nissan has recently announced additional production in Sunderland <u>of the next-generation Qashqai and X-Trail.</u> Given the recent growth and the new models, Nissan's supply chain has seen, and will continue to see, significant growth. Some of this supply chain is in the North East <u>of England but</u> in addition, Nissan currently sources around £0.67 billion worth of components annually from outside the North East <u>of England</u> . It is likely that some of this growth will look to relocate to the North East <u>of England</u> and potentially into the vicinity of the Nissan plan <u>t</u> , given the increased demand from Nissan and the need to secure its supply chain.	Department for Business, Innovation and Skills (BIS) and the Department of Energy and Climate Change (DECC) to form the Department for Business, Energy and Industrial Strategy (BEIS)
MM24.	4	2.3 Para.3	16	 Ssite size:ranging from 9,000<u>sqm</u> to 37,000-sqm; Aadjacency to industry: -Ttransport links: <u>the</u>The Ssite availability: Landland 	For consistency
MM25.	4	2.4.1	19	The NELEP published the SEP for the North East <u>of England</u> in 2014. The aim of the SEP is to create "more and better jobs" to address the productivity gap between the North East <u>of England</u> and the best performing areas within the UK.	For clarity
MM26.	5	2.4.2 Para.1	20	 The Sunderland City Deal (in partnership with South Tyneside) was signed between the two Councils and the Government in 2014. The City Deal has five key aims: Dedelivery of the International Advanced Manufacturing Park; Ccommitment to co-designing a local Skills Compact with local businesses; Dedelivery of the New Wear Crossing; Iinfrastructure for Ultra Low Emission Vehicles; and Sunderland and South Tyneside Councils' commitment to supporting the development of the North East Combined Authority. 	For clarity and consistency
MM27.	6	2.5	22	Sunderland <u>City</u> Council,	For clarity and consistency
MM28.	6	2.5 Para.1	23	The IAMP <u>site</u> will be located	For clarity
MM29.	6	2.5 Para.3	25	The site currently mainly comprises of arable farmland. The River Don runs through the centre of the area. <u>The Grade II listed Hylton Grove Bridge runs</u> <u>over the River Don. The site was previously crossed by railway infrastructure</u> <u>which is no longer present on site and</u> existing development is limited to mainly agricultural buildings which are distributed across the site along the A1290, off Downhill Lane and Follingsby Lane. The North East <u>Land Sea and</u> Airc raft Museums is <u>are</u> located in the southern part of the site next to the A1290 / Washington Road along with some residential properties. <u>There are also</u> <u>approximately 2.5ha of playing fields located adjacent to the museums.</u>	To reflect the Statement of Common Ground agreed with Historic England 260916/HISENG/029/B and to address the County Archaeologist (Rep: 1901816/CA/013/A) the councils propose to make reference to historical assets. To address the Statement of Common Ground agreed with Sport England (220916/SE/022) propose to make reference to the playing pitches.
MM30.	8	3 Dare 1	29	Once adopted,tThe IAMP AAP will form part of the statutory development	Grammatical error
MM31.	8	Para.1 3 Para.2	30	plan for both Councils. The IAMP AAP has taken account of the IAMP's <u>nationally significant</u> status as a NSIP . The IAMP AAP is intended to guide the preparation of the DCO application and <u>other applications that may be required and to</u> inform its <u>a DCO</u> Examination.	For clarity and consistency
MM32.	8	3 Para.3	31	As the wider site includes other uses (including agricultural and residential) which may remain even once the IAMP is implemented, The IAMP AAP is also a development plan along with the tow Councils' respective Local Plans for the determination of any planning applications submitted within the IAMP <u>AAP</u> area that are unrelated to the IAMP proposal itself will be assessed in accordance with the two Councils' wider development plans alongside the IAMP AAP, given that the wider site includes various uses (including agricultural and residential) that will remain even once the IAMP project is implemented.	Clarity
MM33.	8	3 Para.6	34	Adopted Plan A number of policies have been saved and still form part of the development plan. This includes saved policy EC1 which states that the <u>Sunderland</u> City Council will encourage proposals which "develop the city's role as a major manufacturing centre, especially in relation to advanced or high technology processes".	Clarity and consistency
MM34.	8	3 Para.3		<u>Sunderland's Local Plan will comprise of three parts, the</u> Core Strategy and	Clarity
MM35.	8	3		DevelopmentPlan, the Designation and Allocations Plan and the IAMP AAP.It also provides the policy context for the areas of safeguarded land should there	Clarity
		Para.4		become a need to release further land for expansion of the IAMP in the longer	
MM36.	8	3.2.1 Para.2	35	term Emerging Local Plan The emergingSunderland's new Local Plan will comprise of three parts, the a Core Strategy and an AllocationsDevelopment Plan, the Designation and	To reflect updates to Sunderland's Local Plan

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				Allocations Plan and along with the IAMP AAP. The policies in the Revised Preferred Options draft Core Strategy (2013) have been taken into consideration in preparing the IAMP AAP.	
MM37.	8	3.2.1 New para.3	36	Sunderland's draft Core Strategy and Development Plan was approved by Cabinet in July 2017 for consultation. The draft Plan identifies the IAMP as a strategic priority, essential in the delivery of the Plan's spatial strategy.	To reflect updates to Sunderland's Local Plan
MM38.	8	3.2.1 Para.3		The draft Core Strategy Policy CS3.2 identifies land to the North of Nissan as one of two strategic sites. The Vaux site is the other strategic site and will compromise a mixture of business and residential uses. Policy CS3.2 explains that development on the north of the Nissan site will comprise land uses in use classes B1(b) (research and development), B1(c) (light industry), B2 (general industrial) and B8 (storage and distribution). Emphasis will be given to particular developments which support low carbon technologies. Offices (B1(a)) will only be acceptable when ancillary to the wider development and should not be of a scale where they impact upon the deliverability of office sites in Sunderland City Centre. It also states <i>"the site will be developed to accommodate major employers and should be in accordance with an agreed masterplan. Piecemeal development will not be acceptable. Due to its location, a high standard of design and landscaping will be sought to minimise its impact on the landscape"</i> . The IAMP AAP sets out the framework for this masterplan and the policy framework to ensure comprehensive and not piecemeal development.	To reflect updates to Sunderland's Local Plan
MM39.	9	3.2.1 Para.5		Draft Policy CS3.4 states that subject to sufficient evidence to demonstrate demand for employment land which cannot be met within the existing employment land area, Sunderland City Council will work with South Tyneside Council to deliver this through the production of a development plan document at the earliest opportunity. The IAMP AAP is that development plan document, with the Commercial and Employment Technical Background Report providing the relevant evidence. The draft Core Strategy recognises that the strategic site to the north of Nissan will involve development of land within the Green Belt.	To reflect updates to Sunderland's Local Plan
MM40.	9	3.2.1 Para.7		Sunderland City Council's consultation on the Strategic Growth Options (<u>May</u> 2016) recognises that the exceptional circumstances case for the release of the site from the Green Belt will be considered through the IAMP AAP. The 'Exceptional Circumstances for releasing land from the Green Belt Technical Background Report' demonstrates the exceptional circumstances required to amend the Green Belt boundary.	To reflect updates to Sunderland's Local Plan
MM41.	9	3.2.2 Para.2	38	The South Tyneside LDF Core Strategy Development Plan Document (DPD) was adopted in 2007, <u>T</u> the Development Management <u>Policies</u> DPD was adopted	For clarity
MM42.	9	3.2.2 Para.5	41	The Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report, for the IAMP AAP demonstrates the exceptional circumstances required to amend the Green Belt boundaryies in both local authority areas.	Grammatical error
MM43.	9	3.3.1	42	The purpose of the IAMP AAP is to guide the delivery of future comprehensive development at the IAMP. The IAMP AAP has been prepared in partnership by both Councils. It should be read as a whole alongside policies within the adopted and emerging Sunderland and South Tyneside Local development <u>p</u> Plans as these will continue to apply within the IAMP area, except where there is a site_specific policy set out in the IAMP AAP. The AAP policies mapPolicies Map at Appendix A updates that part of the proposals mapsProposals Maps of both Sunderland and South Tyneside's Local currently adopted development <u>p</u> Plans.	For clarity and consistency
MM44.	10	3.3.2 Para.1	43	 Eenable Ereview Rreview Rrecognise the strategic importance of the IAMP (including its NSIP nationally significant status) 	To reflect updates to Sunderland's Local Plan
MM45.	10	3.3.2 Para.2	44	 This approach is supported by the Planning Inspectorate who have which has advised that the benefits of preparing an AAP for the IAMP are that: lit allows for full consideration of all issues and options to ensure the selected site is the most suitable; lit provides a vehicle to demonstrate that proper co-ordination has taken place with other bodies and councils (under the Duty to Co-operate); lit involves an NPPF compliant method of securing changes to the Green Belt through the demonstration of 'exceptional circumstances'; and lit provides a clear policy context against which to consider future applications for DCOs and planning permission. 	Grammatical errors
MM46.	10	3.3.3 Para.1	45	 Environment and Ecology; Landscape Character; Transport; and 	For clarity and consistency
MM47.	10	3.3.3	46	The Technical Background Reports are available on the South Tyneside Council and Sunderland City Council and South Tyneside Council websites:	For clarity and consistency

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		Para.1		The IAMP AAP is was subject to	
MM49.	10	3.4 Para.2	48	The SA is a statutory requirement and is built on the SAs developed for each <u>Council's'</u> Local development pPlans. It covers the options for the location of the IAMP,	For clarity and consistency
MM50.	11	3.4 Para.3	49	It was agreed with Sunderland City Council and South Tyneside Council This process concluded that a Habitat Regulations Assessment was not required.	For clarity and consistency
MM51.	11	3.5 Para.3	52	this joined up city-regional up regional approach affecting the whole region. For example, focused around transport,	For clarity and consistency
MM52.	11	3.5 Para.4	53	on the Sunderland City Deal.	For clarity and consistency
MM53.	11	3.5 Para.5	54	A The Duty to Co-operate Compliance Statement <u>accompanies</u> the will be provided by the Councils to accompany the IAMP AAP when it is submitted to the Planning Inspectorate. This will <u>and</u> explains how the <u>dDuty</u> to <u>eCo-</u> operate	For clarity and consistency
MM54.	11	3.6 Para.1	55	 has been implemented. Preparation for of the IAMP AAP has undergone various issues and options consultation stages in accordance with under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is described in the Statement of Consultation., including: The economic scenarios to determine the scale of the proposal; Alternative locations across the North East region; Alternative locations within Sunderland and South Tyneside; and 	This section has been superseded by the Statement of Consultation contained in the Statement of Compliance (PSD10)
MM55.	11	3.6 Para.2		 Alternative locations within the broad area of land to the north of Nissan. The previous stages of consultation undertaken to inform the IAMP AAP Publication Draft were: IAMP for the North East Region (Consultation February to March 2015). This sets out a range of initial key issues and options for consideration in relation to the IAMP. It presented evidence regarding the need for an IAMP and consulted on a range of options to take account of the different economic scenarios, and included indicative maps showing alternative potential locations for the IAMP. 	This section has been superseded by the Statement of Consultation contained in the Statement of Compliance (PSD10)
MM56.	11-12	3.6 Para.2		IAMP: Green Belt and Site Selection Options Paper (GBSSO, Consultation December 2015 to February 2016). This document built on the 'IAMP for the North East Region Consultation' taking into account comments on this initial consultation paper. The GBSSO presented the demand case for the IAMP in further detail, considering and discounting alternative locations across the region for a large scale employment site to meet the needs of the automotive and advanced manufacturing sectors. The document assessed the Green Belt area to the north of Nissan in order to understand the impact of potential boundary changes on the five purposes of Green Belt as defined in the NPPF. The paper also presented the proposed vision and objectives for the IAMP AAP along with analysis of three potential site options in the broad area to the north of Nissan.	This section has been superseded by the Statement of Consultation contained in the Statement of Compliance (PSD10)
MM57.	12	3.6 Para.3		 The outcome of the previous consultations can be summarised as follows: Preference for the 'moderate growth scenario' requiring a development of around 140 – 150 hectares to accommodate growth in the automotive and advanced manufacturing sectors; Preference for the location of the IAMP on land to the north of Nissan; and Preference for the site to be located adjacent to Nissan, broadly in line with Option 1 (as presented in the GBSSO paper). Consultation on the IAMP AAP Publication draft complieds with the consultation process set out in the Sunderland City Council and South Tyneside Council Statements of Community Involvement (SCI). 	This section has been superseded by the Statement of Consultation contained in the Statement of Compliance (PSD10)
MM58.	12	3.6.1	56	Appraisal of <u>Alternative</u> Options	Clarity
MM59.	12	3.6.1 Para.2	57	and new employees at <u>the IAMP., and the location of the safeguarded land</u> was moved to the west to maintain a larger expanse of Green Belt land north- south.	To reflect the proposed position on safeguarded land
MM60.	12	3.6.1 Para.5	60	development of the IAMP , as well as the potential release of additional expansion land for the long term development of the IAMP beyond 15 years; this is known as 'safeguarded land'.	To reflect the proposed position on safeguarded land
MM61.	13	3.6.1 Para.8	63	 <u>Tthe</u> use ofinto the Green Belt; <u>and</u> <u>Tthe</u> retention of a strategic Green Belt corridor to the north of the IAMP AAP area to maintain a gap between settlements and prevent neighbouring towns merging into one another;<u>-and</u> <u>The inclusion of areas of safeguarded land to ensure revised Green Belt</u> <u>boundaries are capable of enduring beyond the IAMP AAP period.</u> 	To reflect the proposed position on safeguarded land
MM62.	13	3.7 Para.1	64	There are currently twothree_NSIPs being progressed on sites to the north of Nissan. One of these is the IAMP and the other istwo are Highways England's are being delivered over a similar time-frame through DCOs.	For clarity
MM63.	13	3.7.1 Para.1-2	66	The Secretary of State designated the IAMP as nationally significant in September 2015. As a result, the IAMP can the only IAMP development can only be authorisedimplemented, within the boundary of the designated area, by a DCO made pursuant to the Planning Act 2008.	For clarity
MM64.	13	3.7.2	68	The <u>DCO application is intended to be</u> submit <u>ted</u> during 2017. The proposal at the Testos junction is for a grade-separated A19(T) which is	To reflect changing circumstance

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		Para.2		aimed at helping to relieve congestion and improve road safety at the current roundabout. The Testos DCO is to be submitted in 2017. Further	
MM65.	13	3.7.2 Para.3	69	In respect of Downhill Lane, Highways England is consultinged on options for the scheme in <u>Autumn/Winter</u> summer 2016 with a preferred option to be announced in 2017 before the end of 2016. It is currently anticipated that the DCO application will be submitted in late 20172018.	To reflect changing circumstances
MM66.	14	3.7.3 Para.1	70	The IAMP AAP therefore provides <u>the</u> planning policy <u>framework</u> support for the IAMP to which the Secretary of State will have regard when determining the DCO.	For clarity
MM67.	14	3.7.3 Para.2	71	within the IAMP-DCO, for example in relation to a design code. Those	To ensure the Plan is delivery neutral
MM68.	14	3.7.3 Para.3	72	consented by <u>a DCO within the designated NSIP boundary.</u> It is	Clarity
MM69.	15	4.1 Para.1-3	75	The spatial strategy for the IAMP AAP seeks to deliver a comprehensive development scheme comprising of 260,000 sq m floorspace150ha of land for automotive and other advanced manufacturing, engineering and related distribution businesses. Approximately 110435ha is retained within the IAMP AAP area along the River Don corridor to accommodate some of the for environmental mitigation required for biodiversity loss within the site and remains designated as Green Belt. The IAMP AAP comprises a core developable area of 100ha with a further 50ha of land safeguarded for possible future development in the longer torm. In addition_135ha is retained within the IAMP AAP area along the River Don corridor to accommodate some of the for environmental mitigation required for biodiversity loss within the site and remains designated as Green Belt. The IAMP will create a world class facility fit for the demands of the automotive and advanced manufacturing sectors in the 21 st contury. The policies map at Appendix A establishes the spatial strategy for the IAMP. The strategic policies and AAP policies map set a framework to ensure integration with the Nissan plant and the Enterprise Zone; a high quality environment in a setting along the River Don corridor; and accessibility to the improved A19 with access to labour and export markets.	To reflect changes a discussed at the EIP
MM70.	15	4.1 Para.4	76	The purpose of the Spatial Strategy and the strategic policies	Clarity
MM71.	15	4.2	77	 Spatial Strategy Policies The spatial strategy and AAP Policies Map set a framework to ensure integration with the Nissan plant and the Enterprise Zone; a high quality environment in a setting along the River Don corridor; and accessibility to the improved A19 with access to labour and export markets. 4.2.1 Development of the IAMP 	Clarity
MM72.	15	Policy S1	Policy S1	 Policy S1: <u>Spatial Strategy for</u> Comprehensive Development A-The <u>c</u>Comprehensive development of the IAMP for <u>the principal uses</u> associated with the automotive and advanced manufacturing businesses <u>will be delivered by</u>: shall be enabled by releasing 100 ha of land from the Green Belt and safeguarding a further 50ha for potential longer term development, as shown on the policies map Revising the Green Belt boundary to release 150ha of land from the Green Belt. Allocating approximately 150ha of land for the development of principal uses (as defined in Policy S2) in the Employment Areas. Designating approximately 110ha of land as an Ecological and Landscape Mitigation Area to provide for mitigation and/or compensation of the ecological and landscape impacts of the IAMP development 	To address representations submitted by Town End Farm Partnership (051016/TEFP/039/A) and Nissan Motor Manufacturing (UK) 210912/NISSAN/032/E. The Councils propose to amend the policy to enable other planning applications or DCOs to be assessed providing that they do not prejudice the objective or the comprehensive development of the IAMP.

		<u>de</u>	velopment.	the IAMP.
		4) <u>R</u> e	equiring Masterplans, Design Codes and Phasing Plans to be	
		<u>su</u>	bmitted which demonstrate how development:	To reflect discussions at the EIP
		i.	will meet the objectives of the AAP and will not prejudice	regarding the delivery of
			comprehensive development of the IAMP;	safeguarded land.
		ii.	ensures the proposed development is designed and orientated to	
			relate well to the existing employment area and Enterprise Zone	To reflect the Statement of
			and established infrastructure;	Common Ground agreed with the
		iii.	contributes fully to the delivery of the IAMP as a project of national	Church Commissioners
			significance;	
		iv.	contributes fully, in a proportionate and timely manner, towards	
			providing the infrastructure identified in the IDP;	
		۷.	contributes fully, in a proportionate and timely manner, to providing	
			for the mitigation required for the IAMP, including environmental	
			mitigation; and	
		vi.	is capable of being implemented without breaching the provisions of	
			the Planning Act 2008.	
		B. Only the	e delivery of a single comprehensive scheme which meets the	
		objective	es of the IAMP AAP will be supported. To demonstrate	

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				 comprehensive development the scheme promoter in submitting a DCO application shall: ensure the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone and established infrastructure; ii. include a detailed masterplan incorporating a unifying design code; iii. include a phasing plan for 15 years for the delivery of the IAMP AAP area. This shall exclude the safeguarded land; and iv. show how the application complies with policy Del2. 	
MM73.	15	4.2.1 Para.1	78	This policy releases 100ha-150ha of land to the north of Nissan within the IAMP AAP boundary from the Green Belt for allocation for employment uses. Within the AAP area, the current North East Land Sea and Aircraft Sea Museums is under review. This site will be appropriate for development if the museum is not required in this location. are present and are anticipated to remain on the site. There are also approximately 2.5ha of playing fields located adjacent to the museums. These will be retained on the site until deemed surplus to requirement by an up-to-date Playing Pitch needs assessment, in consultation with Sport England. Should the playing fields be required for development prior to being evidenced as surplus to requirements, they should be re-provided in accordance with Sport England's playing field policy exception E4.	Proposed modification to reflect that it is anticipated that the Museum will remainon site and reflects representations received from David Robinson (100816/ROBINSON/037) North EastLand Sea and Air Museum (260916/NELSAM/026) and Save the Trident (220616/STT/024) To reflect Sport England (220916/SE/022) representation and Statement of Common Ground that the playing pitches will remain on site until it can be justified that they are surplus to requirements.
MM74.	16	4.2.1 Para.4		In order to accommodate future demand for employment related development and growth of established businesses, sufficient land should be made available to ensure the long term sustainability of the IAMP. <u>The Spatial Strategy</u> <u>allocates 150ha of land for development of principal uses for development.</u> The designation of 50ha of safeguarded land will ensure Green Belt boundaries endure beyond the end of the IAMP AAP period and support the future sustainability of the IAMP.	To reflect approach to safeguarded land
MM75.	16	4.2.1 Para.5		The amount of safeguarded land identified in this policy is determined using evidence from the Strategic Employment Review (PWC, 2013) and is justified in the Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report. This land has therefore been released from the Green Belt but safeguarded for possible development beyond the plan period, and will only be brought forward for development allocation through a future review of this AAP or the wider Local Plans of the two Councils.	To reflect approach to safeguarded land
MM76.	16	4.2.1 Para.6	81	 dDelivery of a world class facility on the necessary scale at a pace to meet market demand; eEnd user confidence in deliverability and the potential for future expansion; eEnvironmental mitigation measures and key infrastructure which are delivered alongside development proposals; and hHigh standards of design, place making and estate layout. 	Grammatical and clarity
MM77.	16	4.2.1 Para.7	82	on a piecemeal basis, whichas this would undermine	Clarity
MM78.	16	4.2.1 Para.8	83	to assemble the site for <u>the IAMP</u> and	Grammatical
MM79.	16		84	 The designation of approximately 110ha of land within the AAP area as an Ecological and Landscape Mitigation Area (ELMA) will provide a focus for implementing any mitigation and/or compensation for the impacts of the IAMP development on the area's habitats, species and landscape. The precise area within the ELMA that will be needed for mitigation and/or compensation will be proportionate and (together with the specific location of that area) will be determined through detailed environmental assessment supporting an application for consent, which will be the subject of consultation with landowners, statutory consultees and the public as part of that application process. The extent of the ELMA: allows for flexibility in locating mitigation of development of both the Employment Areas; and therefore demonstrates that there is sufficient land adjacent to the IAMP with the potential to deliver the 'worst case' amount of ecological mitigation necessary for the IAMP, which in turn supports the deliverability of the IAMP. 	For clarity and to reflect the Statement of Common Ground agreed with the Church Commissioners
MM80.	16	Policy S2		 <u>AAP.</u> Policy S2: Green Belt and Safeguarded Land A. The IAMP AAP policies map shows areas designated as Green Belt or safeguarded land. B. 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. C. Development adjacent to land designated as Green Belt shall ensure boundaries are recognisable and permanent through the use of built form or 	To reflect approach to safeguarded land

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				established landscaping buffers.	
MM81.	16	4.2.2 Para.1		-IAMP is a strategic site of national and regional significance. Removing 150 ha from the Greenbelt and allocating 100 ha for employment development in this Plan period and safeguarding 50 ha enables longer term development needs to be met without revisiting the Green Belt Boundary. This aligns with the NPPF which advises that Green Belt boundaries should not need to be altered at the end of the development plan period,. <u>It</u> and recommends identifying areas of 'safeguarded land' between the urban area and the Green Belt in order to meet longer term development needs beyond the plan period. The IAMP AAP policies map updates the Council's' existing adopted Local Plan key diagrams and proposals maps in respect of the new Green Belt boundary.	To reflect approach to safeguarded land
MM82.	17	Policy S3	Policy S2	 4.3.1 Principal-Land Uses Policy S32-Principal Land Uses A. Through the DCO application, consent shall be granted for employment development, in the allocated employment areas on the policies map, where the intended uses directly relate to the automotive and advanced manufacturing sectors for Development of the Employment Areas must be for the Principal Uses of production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, as defined in paragraphs 86-87, and related Supporting Uses. B. To ensure premises are retained for their original permitted use in the long term, the DCO must contain requirements to that effect, or otherwise the Councils may consider making a direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 to that effect. B. Employment development proposals from other sectors for B2 uses and B8 uses shall be acceptable where: i. demand for this other type of use to be located within the IAMP can be demonstrated that this type of use is not detrimental to the operation or known needs of the principal uses and the objectives of the IAMP AAP or to the comprehensive development of the IAMP, and ii. it can be demonstrated there are no alternative, suitable locations. C. Development consent for B2 and B8 uses should be granted subject to DCO requirements to ensure premises are retained for the original permitted use in the long term. C. The North East Land Sea and Air Museums (NELSAM), as shown on the Policies Map, will be retained as a visitor attraction, with proposals to enhance the attractions being encouraged. D. Proposals for retail and leisure uses outside of the Hub, as shown on the Policies Map, will not be permitted, with the exception of the modest scale ancillary uses in the Northern Employment Area (aenoted by an 'N' on the Policies Map). F. The Ecological and Landscap	To clarify the scale and quantum of the principal and supporting uses that will be allowed. This reflect representations from W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/C), and Newcastle City Council (260916/NCC/034/B). To reflect submission to Matters, issues and Questions (Matter 3) To reflect the Statement of Common Ground agreed with the Church Commissioners.
MM83.	17	4.3.1	85	Iandscape. This policy supports the IAMP AAP objectives to: build on	Grammatical
MM84.	17	Para.1 4.3.1 Para.2	86	from a traditional linear model, based on design, and materials conversion to fabrication, to one based on greater flexibility concerningof the range of materials	Grammatical
MM85.	17	4.3.1 Para.3	87	 nNano-engineering; aAdditive/precision manufacturing; dDesign/management of supply chains; gGreen manufacturing; nNext generation electronics; and cContinuous manufacture of pharmaceuticals / bio manufacturing. 	Grammatical
MM86.	17-18	4.3.1 Para.4	88	The IAMP's principal use is further justified in the Commercial and Employment Background Report. This policy seeks to satisfy demand from the automotive and advanced manufacturing sectors <u>and</u> ; protect ing the IAMP AAP area from other uses such as general employment development, residential development and large scale retail or leisure uses. <u>above 1,500 sq m gross floorspace</u> .	Clarity
MM87.	18	4.3.1 Para.5	89	in the DCO and/ or a Town and Country Planning (General Permitted Development) Order Article 4 Direction, which can remove specific development rights related to change of use or permitted development or operational development.	For clarity to reflect proposed modifications to policy S2
MM88.	18	4.3.1 Para.6	90	The designation of the IAMP as a commercial and business NSIP by the Secretary of State precludes the provision for residential uses as part of the IAMP.	Clarity
MM89.	18	Policy S4	Policy S3	Policy S4 <u>3</u> : Mix of usesScale and Quantum of Principal and Supporting Employment Uses Within the IAMP Employment Areas allocated employment areas shown on the	To reflect the approach to safeguarded land To clarify the scale and quantum

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				 IAMP AAP Ppolicies Mmap, planning permission shall-consent will be granted for up to 260392,000 sqm of employment-space for the Principal and Supporting Employment Uses as follows: where the mix of uses is: i. up to 24,000 sq m of employment space for B1(a) and B1(b) where this is in support of the Principal Uses, as set out in Policy S3; and i. up to 356,000sqm of employment space for the Principal B1(c), B2 and B8 class uses; and ii. up to 36,000sqm of employment space for Supporting B1(a) and B1(b) class uses, only where this is related to the Principal Uses defined in Policy S2. ii. up to 236,000 sq m of employment space for B1(c), B2 and B8 uses. 	of the principal and supporting uses that will be allowed. This reflect representations from W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/C), and Newcastle City Council (260916/NCC/034/B).
MM90.	18	4.3.2 Para.2	92	It is recognised that an element of B1(a) office space for business services is required either asand B1(b) research and development space will be required, as ancillary space to support offices for B2 and B8the Principal Uuses or for supporting business services.	Clarity
MM91.	18	4.3.2 Para.3		The primary <u>scale and quantum of mix of uses set out in the policy originates</u> from the 'Strategic Employment Study' (2013) and the schedule of employment and floorspace (2014) submitted as part of the City Deal. The scale and mix of uses is evidenced and justified within the Commercial and Employment	Clarity
MM92.	18	4.3.2	93	Background Report. growth employment sectors, in the most appropriate locations to attract private sector investment, and encourage	Clarity
ММ93. ММ94.	18-19	Policy S5 4.3.3 Para.1		 Policy S5: Ancillary uses A. To support the delivery of a sustainable scheme the following ancillary uses shall be permitted within the IAMP as part of the comprehensive scheme comprised in the IAMP DCO application: education and training facilities; managed workspace (up to a total of 3,000 sq m gross floorspace); a range of local scale retail and leisure uses (up to a total of 1,500 sq m gross floorspace); a range of local scale retail and leisure uses (up to a total of 1,500 sq m gross floorspace); nursery and child care facilities (up to a total of 1,000 sq m gross floorspace); and a notel with associated leisure and conference facilities. B. 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, which does not undermine proposals for the principal uses. C. Ancillary uses shall not prejudice the operation of Use Class B uses, including the expansion of operations. D. In addition to the Hub location, small scale retail and leisure provision of up to 1,000 sq m gross floorspace shall be supported to service the northern extent of the IAMP, north of the River Don. Ancillary uses will be primarily to serve the existing and new businesses in the locality, but available for all to use. 	Policy has been deleted and merged with Policy S6 to create a new Policy S5. This is for clarity and to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/D), and Newcastle City Council (260916/NCC/034).
				an attractive working environment and meet the needs of a skilled workforce. Ancillary uses associated with retail, leisure and hotel facilities and space for education and training provision will be necessary to meet the vision and objectives for the IAMP.	
MM95.	19	4.3.3 Para.2		Complementary ancillary uses are required within the IAMP AAP area to allow existing and new employees the opportunity to access facilities and services locally, making the development more sustainable. These facilities may also be accessible and beneficial to employees in the adjacent Nissan complex and the residents of surrounding residential areas, but are primarily to serve the employment uses	Supporting text deleted for clarity
MM96.	19	4.3.3 Para.3		This approach is in accordance with the NPPF which emphasises the importance of sustainable development through the creation of 'a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being'. Therefore, it is important for the IAMP AAP to include provision to meet the needs of the business community at the IAMP and 'secure a good standard of amenity for all existing and future occupants of land and buildings'.	Supporting text deleted for clarity
MM97.	19	Policy S6		 Policy S6: The Hub A. Permitted uses for the Hub are specified in AAP Policy S5. B. Proposals for the Hub, as shown on the IAMP AAP policies map, shall provide for: i. A multimodal transport interchange accommodating public transport, cycling and pedestrian access; and ii. A higher density design compared to surrounding B2 and B8 uses to enable a concentration of required uses. C. Proposals for the Hub shall be guided by parameters specified in the IAMP Design Code, which shall be submitted as part of the DCO. 	Policy has been deleted and merged with Policy S6 to create a new Policy S5. This is for clarity and to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), and the Statement of Common Ground as agreed with

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					Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C).
MM98.	19	4.3.4		This policy sets out the principles for the layout and design of the IAMP Hub, which performs the role of a local centre within the IAMP AAP. This will aid the delivery of the aspiration to create an 'innovation district'. It will help create an identity for the IAMP, by providing a focal point including a range of supporting facilities such as retail uses, restaurants, cafes, a hotel and leisure facilities. It will also encourage public transport provision and use, as well as cycling and walking by creating an identifiable node. It will also ensure adequate support infrastructure is available in an accessible and therefore sustainable location for workers in the IAMP. This will also ensure the IAMP is an attractive place where workers want to be and therefore a place where investors and businesses user to invest and leasts	Supporting text deleted for clarity
MM99.	19	New Policy S5	Policy S4	 businesses want to invest and locate. Policy S4: The Hub and Ancillary Uses A. To support the delivery of the IAMP the following ancillary uses will be permitted to form 'The Hub', in the location shown on the Policies Map, as part of the comprehensive development of the IAMP: i. a hotel (Use Class C1) (up to 150 beds) with associated leisure and conference facilities; ii. a small gym (D2) up to 1,000sqm gross floorspace; iii. education and training facilities (Use Class D2 (c)) to support the Principal Uses; iv. managed workspace for micro and start-up businesses (Use Class B1a) up to a cumulative total of 3,000sqm gross floorspace, which is in addition to the total floorspace allowance set out for Supporting Uses provided for in Policy S2; v. nursery and child-care facilities (up to a cumulative total of 1,000sqm gross floorspace); vi. a range of small scale retail units (Use Classes A1 and A3) up to a cumulative total of 1,500sqm gross; and viii. a multi-modal transport interchange accommodating public transport, cycling and pedestrian access. B. The Hub should provide for higher density development compared to the surrounding employment uses in IAMP, to enable a concentration of germitted uses. C. To support the Northern Employment Area a range of retail units (Use Classes A1 and A3) will be permitted where it can be demonstrated that they would be genuinely ancillary to the Principal Uses of the IAMP and would not harm the vitality and viability of other designated retail centres. 	A new policy S5 is proposed to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), Town End Farm Partnership (051016/TEFP/039/A) and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C) To reflect discussion at the EIP.
MM100.	19	4.3.4	94	The vision for the IAMP is for 'a planned and sustainable employment location'. For this vision to be realised, the IAMP should include ancillary uses to provide an attractive working environment and meet the needs of a skilled workforce. Ancillary uses associated with retail, leisure and hotel facilities and space for education and training provision will be necessary to meet the vision and objectives for the IAMP.	To reflect PM54 and to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), Town End Farm Partnership (051016/TEFP/039/A) and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C)
MM101.	19	4.3.4	95	Complementary ancillary uses are required within the IAMP AAP area to allow existing and new employees the opportunity to access facilities and services locally, making the development more sustainable. These facilities may also be accessible and beneficial to employees in the adjacent Nissan complex and the residents of surrounding residential areas, but are primarily to serve the employment uses.	To reflect PM54 and to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), Town End Farm Partnership (051016/TEFP/039/A) and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C)
MM102.	19	4.3.4	96	The Hub is located in the south of the AAP area, bordering the A1290 in order for existing employees at Nissan and related current supply chain to access the facilities and transport interchange easily and to also integrate an existing	To reflect PM54 and to reflect the representations raised by, IAMP LLP

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				business, the Three Horseshoes Public House, into the Hub offer.	(260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), Town End Farm Partnership (051016/TEFP/039/A) and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C)
MM103.	19	4.3.4	97	This approach is in accordance with the NPPF, which emphasises the importance of sustainable development through the creation of "a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being". Therefore, it is important for the IAMP AAP to include provision to meet the needs of the business community at the IAMP and "secure a good standard of amenity for all existing and future occupants of land and buildings".	To reflect PM54 and to reflect the representations raised by, IAMP LLP (260916/IAMPLLP/035) W Gordon Proud Trust, Ms Diane Talbot, Buckley Burnett Ltd (260916/WGPTPTDTBB/023), Town End Farm Partnership (051016/TEFP/039/A) and the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017D), and Newcastle City Council (260916/NCC/034C)
MM104.	20	4.4.1 Para.4		Opportunity for future expansion: In addition to delivering the scheme of 100ha, a further 50ha of land has been safeguarded for potential future expansion of the IAMP	To reflect approach to safeguarded land
MM105.	20	4.4.1 Para.6	102	 Improving access and connectivity: This objective seeks to: Ooptimise vehicular access into the site from the existing road network, in particular the A19, as well as promoting new highways connections to optimise access to the wider area; lincrease access to the site through sustainable transport networks; and Ooptimise access and permeability for cyclists and pedestrians within the developed areas of the IAMP, to encourage people to walk and cycle to work. 	Grammatical
MM106.	20	4.4.1 New Para.8	104	Preserving and enhancing heritage assets: This objective seeks to preserve and enhance the Grade II listed Hylton Grove Bridge and its setting within the River Don corridor, together with the setting of other heritage assets in the vicinity of the IAMP AAP boundary. Any areas of archaeological significance should also be identified through a desk based assessment and programme of archaeological fieldwork, with any significant remains protected, in accordance with the historic environment policies in the adopted development plans of both Councils.	To reflect the Statement of Common Ground agreed with Historic England 260916/HISENG/029/B and to address the County Archaeologist (Rep: 1901816/CA/013/A) the councils propose to make reference to historical assets.
MM107.	20	4.4.1 Para.8	105	Landscape connectivity and settlement break : The 'Landscape Character Technical Background Report' has such as the Penshaw Monument and Boldon <u>Downhill</u> .	Clarity
MM108.	21-22	Policy D1	Policy D1	 Policy D1 - Masterplan Design A. Proposals for the IAMP must demonstrate how they shall be supported where they reflect the following key design principles: Mmaximise the interface with Nissan and ensure effective movement between the existing site and the IAMP AAP area; Delevelopment plots using an 'open grid' to create a variety of plot sizes; Aa hierarchical street network connected to existing roads and key transport corridors featuring a central boulevard and primary routes to prioritise access from the A19 and integrate the northern part of the IAMP north of the River Don Northern Employment Area with service networks to encourage efficient movement; Delarianage infrastructure to be accommodated within the street network with Seustainable urban Detrainage Seystems (SuDS) placed to enable effective water quality management; Operientation of buildings along the boulevard and primary routes to follow a common building line fronting on to the road, with buildings along the River Don corridor frenting onto the road, with buildings along the River and landscaping uses where possible; and have special regard to preserving and enhancing the significance, including any contribution made by their setting, of heritage assets within and in proximity to the site, including Give consideration to the setting of listed buildings such as Scot's House (Grade II') on the south side of the A184, Hylton Grove Bridge (Grade II) on Follingsby Lane and views from elevated locations such as Boldon Downhill and the Penshaw Monuments; vii. Wwhere feasible, orientation of buildings to make use of solar gain, with due consideration for overheating risks, and to optimise opportunity for solar panel use on buildings; and 	To reflect the Councils response to the Matters, Issues and questions

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MM109.	22	4.4.2	112	 viii. <u>have regard to the presence of the North East Land, Sea and Air</u> <u>Museums (as designated on the Policies Map) as a visitor attraction.</u> B. Compliance with the IAMP AAP design objectives shall be demonstrated by the scheme promoter through the submission of a Design Code as part of the DCO application. B. Proposals must be accompanied by a Design Code for approval by the <u>Councils.</u> IAMP Design Code' which will form part of the DCO application, which will 	Clarity
101109.	22	4.4.2 Para.1	112	AMP Design Code -which will off part of the DCO application, which will	Clarity
MM110.	22	Policy D2	Policy D2	 4.4.3 Public Realm and Landscape Policy D2: Public Realm and landscape A. A public realm and landscape strategy for the IAMP shall be submitted as part of the IAMP DCO application is required to accompany development proposals, based on the following key principles: Mmarking key gateways into the site; Aa comprehensive, wayfinding strategy for cyclists and pedestrians; Uuse of street furniture and landmarks to reinforce the identity of the IAMP, including within the Hub; Cconsistent use of road and pavement materials to reinforce a clear street hierarchy; Provision of green and blue infrastructure at street level; and Uuse of low-level lighting within and closer to sensitive ecological areas. Compliance with the IAMP AAP design objectives shall be demonstrated by the scheme promoter through the submission of a Design Code as part of the IAMP DCO application. 	To ensure the plan is development neutral
MM111.	22	4.4.3 Para.1	113	This policy sets out the over-arching principles for addressing the key public realm and landscape elements of the masterplan, in order to deliver a scheme with a sense of place and which creates its own, unique identity.	For clarity
MM112.	22	4.4.3 Para.2	114	The policy requires the preparation of a public realm and landscape strategy in accordance with the recommendations <u>arising</u> from the Environmental Impact Assessment <u>accompanying the proposed development applications</u> . The strategy	For clarity
MM113.	23	Policy T1	Policy T1	 Policy T1: Highway Infrastructure A. The comprehensive development of the IAMP requires the following package of highway improvements to be secured to be delivered: The DCO application for the IAMP shall demonstrate how the provision of the following package of highways improvements will be secured: i. <u>U</u>-upgrading of the A1290 to increase capacity; ii. Ag new vehicular bridge over the A19 to connect the IAMP with the local road network to the east; iii. Ag new bridge over the River Don to allow access to the <u>Northern Employment Area</u>; northern part of the IAMP; and iv. Nnew distributor roads within the IAMP to accommodate the movement of all users. B. The Phasing Strategy andDevelopment proposals must be accompanied by a tTransport aAssessment submitted as part of the IAMP DCO application shall demonstrate how the IAMP will to: i. assess which specific highways improvements are necessary to ensure the acceptability of the proposals in planning terms and to ensure comprehensive development of the IAMP; and ii. the IAMP will demonstrate how, within the area shown on the Policies Map as "A19 and Local Road Improvements", the development will provide suitable and safe connection to, and integratejon with, Highways England's proposed improvements to the Downhill Lane and Testos Junctions on the A19-within and in the vicinity of the 'A19 Improvements' area shown on the policies map. C. Development proposals must: i. be supported by the submission of a Travel Plan designed to ensure that the development is acceptable in transport sustainability and accessibility terms; and ii. adversely impacteaffects the safe and efficient operation of the local or strategic highway networks; or ii. that-compromises the delivery of these highway improvements-set out in criterion A; or iii. prejudices the comprehensive development and delivery of the IAMP as a whole. 	To reflect discussions at the EIP To clarify that a Phasing Plan must be submitted and to address representations made by IAMP LLP (260916/IAMPLLP/035/E) to identify area shown as A19 and the Local Road Improvements.
MM114.	23	5.1 Para.1	115	The emerging Sunderland Local Plan Core Strategy and Development Plan highlights the Strategic Employment Site as a development which The IAMP will generate significant levels of traffic and may require improvements to the highway network. Subsequent work has confirmed <u>that</u> the improvements <u>are</u>	Clarity
				necessary, as identified in this policy.	

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		Para.3		The redundant 'Leamside Line' runs within close proximity of the site and, if this re-opens, then it would present an opportunity to improve rail connectivity to the site.	
MM116.	23	5.1 Para.3	117	The local and strategic road network, including the A1290 and A19, experiences congestion and delay at peak periods and is close to capacity,. <u>This is</u> influenced in part by the shift operationspatterns of local businesses	Grammatical
MM117.	23	5.1 Para.4	118	Congestion and delay currently occur <u>s</u> within the area Highways England are is planning to	Grammatical
MM118.	23	5.1 Para.5	119	Detailed design work (including further modelling) and the relevant consultation and approvals will be required in finalisingto finalise the design of these measures	Grammatical
MM119.	24	5.1 New para.6	120	Travel Plans will be prepared to demonstrate how the integration and promotion of sustainable travel and transport methods, including Walking, Cycling and Horse Riding (Policy T2), Public Transport (Policy T3) and Parking (Policy T4), will be delivered during the construction and operation of the IAMP.	To reflect discussions at the EIP
MM120.	24	Policy T2	Policy T2	 Policy T2: Walking, Ceycling and Hhorse rRiding A. To promote wWalking and cycling in and around the IAMP, development must-shall be encouraged by: Ensuring ensure Ensuring ensure that any junction / highway measures and any new roads are designed to <u>safely integrate</u> be mindful of potential pedestrian and cycle movements. New routes should seek to ensure that they reflect pedestrian / cycle desire lines and are of a high quality; Ensuring ensure that roads and spaces are designed to consider the needs of all types of users so that conflict between road users and vulnerable users is minimised; Requiring-include appropriate cycling facilities, such as parking, showers and storage, as part of new developments; Ensuring endestrian / cycle link over the A19 to connect the IAMP with the local network; and Provision of provide for improved connections along Follingsby Lane which, will be restricted to use for local access and public transport only. B. Safe access to the open space within the IAMP will be ensured for recreational-horse riding through the provision of bridleways linked to the wider bridleway network. C. Consent shall only be granted for the IAMP where the application for a DCO addresses the matters in paragraphs A and B above in the IAMP Design Code. Where new routes abut agricultural land, appropriate measures to deter public access to agricultural land, appropriate measures to deter 	To reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/G), The Tyne and Wear Local Access Forum (260916/TWJLAF/019A) and National Farmers Union (260916/NFU/028/D).
MM121.	24	5.2 Para.1	121	The aspiration is for the IAMP to be an attractive sustainable multi-modal environment. and fFor this to be realised	Grammatical
MM122.	24	5.2 Para.2	122	The creation of good quality pedestrian and cycle links through the site and which are connected with	Grammatical
MM123.	24-25	Policy T3	Policy T3	 Policy T3: Public Ttransport A-To promote sustainable transport, development The IAMP shall promote and facilitate public transport measures including_must include: Pprovision of enhanced bus services <u>betweeninte</u> the IAMP <u>and:</u> from the surrounding residential areas; Integration with and linkages to, the Tyne & Wear Metro network Heworth and Sunderland multi-modal transport interchanges; and Hebburn, Jarrow, South Shields and Washington centres; ii. <u>Bbus</u> priority measures on the key nodesroutes entering the IAMP; iii. <u>Aa</u>dequate provision for buses on the proposed new bridge over the A19 and over the River Don; iv. <u>Nn</u>ew bus stops and improved waiting facilities within the IAMP AAP area; and v. <u>Nn</u>ew traffic signal installations incorporating facilities to enable priority for buses. 	To address representations made by IAMP LLP (260916/IAMPLLP/035) Cycling UK (210916/EVANS/003)
MM124.	25	5.3 Para.2	126	A study of public transport provision for the IAMP is being led by Nexus. The DCOAny application for the IAMP shallmust have regard to this strategy.	For clarity and to reflect changing circumstances
MM125.	25	5.3 Para.4	128	There is an existing Grade II listed <u>Hylton Grove B</u> bridge over the River Don, but <u>it</u> is not of a sufficient standard to accommodate the IAMP traffic ₇ . <u>T</u> therefore, a new bridge over	Grammatical
MM126.	25	Policy T4	Policy T4	 Policy T4: Parking A. The IAMP Design Code, as part of the Development Consent Order, shall establish the parking standards to be applied to development. The key principles underpinning the standards are as follows and should be included in a Travel Plan as part of the DCO: A. Development must ensure that appropriate provision for car parking is provided in accordance with the Councils' standards. Development proposals must: 	For clarity

Draft) Publication Version) Draft)		Paragraph (August 2017	(to the August 2016 Publication Draft)	Justification for Proposed Modification	
MM127.	25	5.4 Para.1	129	 disabled badge parking spaces; iii. Developments will provide ensure that 25% of the total car parking provision is for the use of car-sharing only; iv. Car parking spaces will be provided across the IAMP make provision for off-street parking through a combination of in-curtilage provision and communal parking areas. On-street parking may be permitted in certain locations; v. ensure that Ssufficient provision is should be made for lorry parking to take account of highway safety and avoidance of congestion on the road network; and vi. On-street parking may be permitted in certain locations;and vi. On-street parking areas across the site. B. The scheme should consider the introduction of a car club facility for the IAMP site. Ensuring appropriate levels of parking is vital if operational and market needs are to be met and the impacts of the development are to be alleviated. However, 	Grammatical
MM128.	26	Policy IN1	Policy IN1	 a pragmatic approach is required wherebyas it is acknowledged that Policy IN1: Infrastructure pProvision A. In demonstrating comprehensive development under policies S1 and Del2, development proposals must show how the following infrastructure will be delivered: i. Aa new electricity sub-station is may be required as part of the comprehensive development of the IAMP DCO to ensure there is sufficient energy to meet the demands of businesses locating at the IAMP. ii. B. Nnew water, gas and electric utility services shallmust be made available to the IAMP development site from the existing utilities infrastructure in the local vicinity to enable occupiers to apply for, and 	To address representations made by IAMP LLP (260916/IAMPLLP/035/H) and to ensure that infrastructure required is delivered.
				 obtain, utility connections to their premises. <u>This may require</u> <u>connections to be made with utilities infrastructure outside of the AAP</u> <u>boundary</u>. <u>iii.</u> C. Nnew telecommunications and broadband services networks <u>shallmust</u> be provided to allow occupiers to apply for, and obtain, telecommunication connections to their premises as required. <u>iv.</u> D. Tthe provision of low carbon and renewable energy systems should be explored. within the Design Code for the DCO. <u>E. In demonstrating comprehensive development under policies S1 and Del2, it</u> must be shown how the infrastructure in paragraphs A to D above will be secured. 	
MM129.	26	5.5 Para.1	130	<u>An primary</u> electricity sub-station <u>may be</u> is-required to meet the energy needs of new businesses locating at the IAMP. <u>If required</u> , tThe location will broadly be adjacent to the A19 north of the River Don. If feasible and viable, the <u>primary</u> electricity sub-station could have the potential to link to renewable energy sources.	Clarity
MM130.	26	5.5 Para.3	132	considered for the IAMP is included	Grammatical
MM131.	26-27	Policy IN2	Policy IN2	 Policy IN2: Flood rRisk and dDrainage A. Development proposals for <u>A</u> new bridge works will be required over the River Don or other watercourses, the design of which must demonstrate that there shallwill be no net loss in floodplain storage capacity nor an increase in maximum flood levels within adjoining properties as a consequence of the proposed works. B. Opportunities offered by new development to reduce the causes and impacts of flooding will be encouraged. To address drainage and flood risk, development proposals must therefore be accompanied by: i. Ag detailed Flood Risk Assessment (FRA) and Water Framework Directive Assessment are required alongside the DCO application or subsequent applications. ii. C. Ag surface water drainage strategy shall be prepared which complies with national design standards and local policy. The scheme promoter shallwill be required to provide Sustainable Drainage Systems (SuDs) capable of ensuring that run-off from the site (post-development) does not exceed corresponding greenfield rates, minimises pollution, provides multifunctional benefits to wildlife, landscape and water quality and is effectively managed with clear ownership in place. iii. D. The scheme promoter shall demonstrateevidence that support development should be demonstratedexists. Where there is insufficient capacity both on and off-site in the foul sever network to support development should be demonstratedexists. Where there is insufficient capacity period be demonstratedexists. 	To reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/I) and representation made by the Environment Agency (071016/EA/042/D).
MM132.	27	5.6 Para.2	134	As part of the DCO application a <u>Development proposals should be</u> accompanied by a detailed Flood Risk Assessment (FRA) will be prepared in accordance with the requirements and guidance set out in <u>the NPPF</u> and PPG.	Clarity and consistency

MM Ref	Page (August 2016 Publication Draft)	Policy or Paragraph (August 2016 Publication Draft)	Policy or Paragraph (August 2017 Version)	Proposed Changes (to the August 2016 Publication Draft)	Justification for Proposed Modification
MM133.	27	5.6 Para.3	135	 The Drainage Strategy should be submitted with the DCO application.	Clarity and to reflect changing circumstances
MM134.	27	5.6 Para.4	136	The structure which carries the new access road crossing of across the River Don	Clarity
MM135.	27	5.6 Para.6	138	the CIRIA SUUDS Manual to different parts of the drainage network, (for example highway drainage).	
MM136.	28	Policy EN1	Policy EN1	 6 Environment-and Ecology 6.1 Landscape-Design Policy EN1: Landscape-Design A. To minimise the impact on landscape character and visual amenity, seek landscape enhancements, as well as to integrate buildings into the surrounding landscape setting, the DCO application shall development proposals must: i. Mminimise the visibility of the development from the A19 and maintain an appropriate landscape buffer (minimum 50m wide) along the A19; ii. Uuse design and landscaping measures to reduce the impact of development along public rights of way; iii. 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; and iv. Cconsider the incorporation of green and brown roofs and green walls into the design of the development. B. As part of the DCO application Development proposals must include a landscape and visual impact assessment shall be prepared to gainwhich demonstrates an understanding of the likely significant effects of the proposed development. Findings during the The assessment shallwill influence the design of the proposals to ensure potential adverse effects are prevented or minimised. C. The designated Ecological and Landscape Mitigation Area, as shown on the Policies Map, will provide the focus for necessary landscape impact mitigation, in addition to landscaping within the allocated employment areas. 	Clarity and consistency To reflect the Statement of Common Ground agreed with the Church Commissioners.
MM137.	28	6.1 Para.2	142	The policy approach seeks to minimise the impact of the IAMP on the surrounding landscape, take opportunities to enhance <u>the</u> 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 <u>the impacts of the</u> development could	Clarity
MM138.	28	6.1 Para.3	143	New planting, in particular along the edges of the development shallshould comprise	Clarity
MM139.	28	6.1 Para.4	144	public views such as views-towards Boldon Downhill and the-Penshaw Monument, and important panoramic views such as those from the <u>Penshaw</u> Monument. This approach is explained in the Landscape Character Technical Background Report.	Clarity and consistency
MM140.	29	Policy EN2	Policy EN2	 Policy EN2: Ecology A. To protect maintain and enhance biodiversity and protect wildlife habitats, the development must: scheme promoter for the IAMP will: Aavoid, minimise and mitigate or_T compensate any adverse impacts on biodiversity and provide net gains where possible; direct and minimise any indirect impacts on designated Local Wildlife Sites (LWS) where possible; Mmaintain and enhance the River Don as a functional ecological wildlife corridor, through improvements to its water quality and geomorphology, and through the implementation of an ecological buffer along the River Don corridor and around Local Wildlife Sites; (with the exception of the new bridge crossing); Minimise loss of semi-natural habitats. Lost or degraded habitats should be replaced with habitats of equivalent or greater quantity and quality to ensure net gains for nature and accommodate protected species located within the AAP area; Minimise loss of existing mature trees, woodland blocks and hedgerows. Around the edges of the development, trees and hedgerows should be retained and enhanced; Delesign swales and Sustainable Drainage Systems (SuDS) to take account of additional wildlife benefits; Rrestrict or minimise public access to areas of ecological sensitivity; and Secure through requirements in a DCO or planning conditions and/or planning obligations, provision for the maintenance and monitoring of appropriate mitigation and or compensation measures. 	To reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/J) and representation by Natural England (290916/NATENG/038/A) and Environment Agency (071016/EA/042D). To reflect the Statement of Common Ground agreed with the Church Commissioners.

Page Paragraph Paragraph (August (August (August F		(August 2017	Proposed Changes (to the August 2016 Publication Draft)	Justification for Proposed Modification	
				 Ecological Impact Assessment shouldmust be included in as part of the Environmental Impact Assessment. This shallis required be undertaken to influence development proposals and ensure potential impacts are prevented or mitigated and/or compensated where mitigation is not feasible. Ecological proposalsmitigation measures must should be designed in conjunction with landscape and drainage specialists (where applicable), to maximise the ecological value of landscape planting and drainage features. Proposals shouldmust include an appropriate long-term Management and <u>Maintenance</u> Plan that will ensure long-term ecological value is maintained. C. The designated Ecological and Landscape Mitigation Area, as shown on the Policies Map, will provide the focus for necessary ecological mitigation and compensation measures. 	
MM141.	29	6.2 Para.2	146	ecological features within the IAMP AAP area through the implementation	Grammatical
MM142.	29	6.2 New para.3	147	For the purposes of this policy the term biodiversity includes all statutory and non-statutory designated sites, protected species, priority habitats and species, wildlife corridors, and habitats and species outside designated sites and not identified as a conservation priority but which are considered locally important.	Clarity and to reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/J) and representation by Natural England (290916/NATENG/038/A) and Environment Agency (071016/EA/042D).
MM143.	29	6.2 Para.3	148	include Elliscope Farm, East / Hylton Bridge and River Don East House;, Usworth Burn and the River Don corridor.	
MM144.	29	6.2 New para.4	149	A sequential process should be adopted to avoid, minimise, mitigate and compensate ecological impacts. This is often referred to as the 'mitigation hierarchy'. For most projects, avoidance, mitigation, compensation and enhancement measures should be identified as part of the Ecological Impact Assessment process.	Clarity and to reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017/J) and representation by Natural England (290916/NATENG/038/A) and Environment Agency (071016/EA/042D).
MM145.	29	6.2 Para.4	150	<u>Ecological mitigation measures will both maintain and enhance By maintaining</u> the River Don as a functional ecological corridor. <u>This-will enable ecological</u> connectivity throughout the development site between existing and new ecological features. across the scheme. The policy also seeks to ensure the creation of networks linking areas of retained and created habitat.	Clarity
MM146.	29	6.2 Para.5	151	to provide off-site mitigation. Any mitigation will also have to satisfy the requirements of associated with the protected species on site that could be impacted by the development.	Grammatical
MM147.	30	6.2 Para.6	152	 The policy specifies the requirement for an Ecological Impact Assessment as part of the Environmental Impact Assessment <u>accompanying development proposals.</u> for the DCO Proposals for mitigation and habitat creation will be informed by the following guidance and information: Department for Environment Food & Rural Affairs (Defra) (2012) Biodiversity Offsetting Pilots: Technical Paper - The metric for the biodiversity offsetting pilot in England; Defra (2012) Biodiversity Offsetting Pilots: Guidance for Developers; Natural England (2010) Higher Level Stewardship: Farm Environment Plan (FEP) Manual; Technical guidance on the completion of the FEP and identification, condition assessment and recording of HLS FEP features. Natural England; Joint Nature Conservation Committee (JNCC) (2010) UK Biodiversity Action Plan Priority Habitat Descriptions; and Descriptions of 'Habitats of Principal Importance' (HoPI). 	To reflect the Statement of Common Ground as agreed with Gateshead Council (260916/GC/017) and representation by Natural England (290916/NATENG/038/B) and Environment Agency (071016/EA/042D).
MM148.	30	Policy EN3	Policy EN3	 Policy EN3: Green Infrastructure A. To provide green and open spaces for recreational use, the DCO application for IAMP and any other applications development must will: i. <u>l</u>incorporate a minimum 50m wide buffer from the riverbanks on both sides along the River Don (to maintain a total minimum 100m wide corridor), linking with the wider Green Infrastructure Ccorridor to the east and west <u>beyond the Plan boundary</u>, and allow recreational access within this buffer where there is low risk of harm to ecological receptors; ii. <u>R</u>retain iii. <u>Cc</u>reatethrough the provision of tree-lined streets iv. <u>li</u>ncorporate 	Clarity and consistency
MM149.	31	6.3 Para.3	156	Within the IAMP, green links canshould be created	Clarity
MM150.	31	Policy EN4	Policy EN4	 Policy EN4: Amenity A. Proposals should not adversely impact the amenity of neighbouring occupiers and residents. The IAMP DCO application shall be supported where the proposal Development must: Ttakes account of the amenity of surrounding uses during the 	To reflect discussions at the EIP and for clarity and consistency

	Page (August 2016 Publication Draft)	Policy or Paragraph (August 2016 Publication Draft)	Policy or Paragraph (August 2017 Version)	Proposed Changes (to the August 2016 Publication Draft)	Justification for Proposed Modification
				 construction phase and business operations; ii. Sseeks to minimise disturbances caused by noise, odours or visual intrusion; and iii. Sseeks to minimise the impact of noise and air pollution in line with national guidelines. B. Where Proposals shall be supported where suitable mitigation measures to take account of amenity considerations are demonstrated are identified, they will be secured by planning obligations, requirements in a DCO or planning conditions. and will be required to support the discharge of requirements for the DCO and conditions for future applications. C. A Construction Environmental Management Plan covering matters including noise, traffic and dust during the construction phase will be required to the DCO. 	
MM151.	31	6.4 Para.1	157	The policy seeks to ensure development does not result in theany harmful or cumulative impact on air quality, noise, odours and dust.	Grammatical
MM152.	32	7.1 Para.1	158	The scheme is currently being progressed on the basis that the scheme promoter <u>delivery vehicle</u> , <u>"IAMP LLP"</u> , (comprising both South Tyneside Council and Sunderland City Council) will establish <u>as a joint</u> venture delivery vehicle, to <u>will</u> prepare and submit the IAMP DCO application,	Clarity and consistency to reflect changing circumstances
MM153.	32	7.1 Para.2	159	The delivery vehicle will be i <u>s</u> in	Clarity
MM154.	32	7.1	160	Other public bodies and in particular <u>G</u> government agencies such as Highways	
MM155.	32	Para.3 Policy Del1	Policy Del1	 England, <u>the</u> Environment Agency As part of the <u>D</u>duty to <u>Ceo-operate</u> Policy Del1: Phasing and Implementation A. The phasing of the IAMP must have regard to the aim of enabling the comprehensive delivery of a sustainable employment-led development from the outset and as the development progresses. Accordingly, a <u>A</u> Phasing Strategy must be submitted with the IAMP DCO any application for proposed 	For clarity
				 <u>development</u>. B. The Phasing Strategy <u>shallmust</u> demonstrate how the comprehensive and integrated infrastructure, services and facilities that will make the scheme acceptable in planning terms will be delivered. C. A Mitigation Strategy and <u>a</u> Management Strategy must be submitted with the IAMP DCO any application and both each should include address the following key elements topics: Landscape and Open Space; Ecology; Drainage; and Sustainable Transport. D. The Phasing Strategy must demonstrate how the strategic infrastructure required for the IAMP, as identified in the Infrastructure Delivery Plan, will be delivered. E. The approved Phasing Strategy, Mitigation Strategy and Management Strategy shallmust be secured by DCO requirement <u>or planning obligations.</u> 	
MM156.	32	7.2 Para.1	162	A <u>P</u> ehasing <u>S</u> etrategy will be required as part of <u>anythe DCO</u> application with the phasing of development expected to reflect the aims of the IAMP AAP. ; helping to deliver the employment focus of the site.	Clarity and consistency
MM157.	32	7.2	163	The project is to be led by investment in and provision of infrastructure for the	Clarity
MM158.	33	Para.2 7.2 Para.3	164	whole site, <u>T</u> this will then ensure The DCO application including the Environmental Impact Assessment will be required to ensure that <u>Agreed</u> mitigation measures must be implemented in accordance with an <u>the approved</u> agreed phasing plan, with full implementation prior to the occupation of the final development phase.	Clarity and consistency
MM159.	33	7.2 Para.5	166	The scheme promoter shallshould manage the delivery process	Clarity
	33	Policy Del2	Policy Del2	Policy Del2: Securing Mitigation	Clarity
MM160.				 A. Mitigation required as a result of the IAMP will be secured through articles and requirements within the IAMPa DCO and/or by planning obligations as appropriate. B. The Phasing Strategy submitted as part of the IAMP DCO application shall demonstrate how the strategic infrastructure for the IAMP will be delivered. Mitigation required as a result of other proposals will be secured through articles and requirements within a DCO, planning conditions or planning obligations as appropriate. C. Where necessary, to make development of the IAMP acceptable in planning terms, developer contributions (in the form of planning obligations) will be sought to mitigate the impact of the IAMP. In seeking any such contributions, regard shallwill be had to scheme viability and other material considerations. 	
MM160. MM161.	33	7.3 Para.1	167	 and requirements within the IAMPa DCO and/or by planning obligations as appropriate. B. The Phasing Strategy submitted as part of the IAMP DCO application shall demonstrate how the strategic infrastructure for the IAMP will be delivered. Mitigation required as a result of other proposals will be secured through articles and requirements within a DCO, planning conditions or planning obligations as appropriate. C. Where necessary, to make development of the IAMP acceptable in planning terms, developer contributions (in the form of planning obligations) will be sought to mitigate the impact of the IAMP. In seeking any such contributions, 	Clarity and consistency

MM Ref	Page (August 2016 Publication Draft)	Policy or Paragraph (August 2016 Publication Draft)	Policy or Paragraph (August 2017 Version)	Proposed Changes (to the August 2016 Publication Draft)	Justification for Proposed Modification
		Para.2			
MM163.	1M163. 33 7.3 170 Para.4		170	Table 1 The Infrastructure Delivery Plan sets out the infrastructure interventionsrequired to mitigate the impact of development proposals. This is described inthe separate Infrastructure Delivery Plan which accompanies this Area ActionPlan.	Clarity
MM164.	34-39	Table 1		Delete Table 1: Infrastructure Delivery Schedule – to be replaced by separate Infrastructure Delivery Plan document.	Clarity and for ease of updating
MM165.	B1	Appendix B B1.1.1	Appendix B B2.1	Draft-IAMP AAP Monitoring Framework Whilst the policies directly inform the decision making process, their strength and successful application will ultimately determine whether or not the overall AAP objectives are achieved. Some objectives will be addressed through the Councils' Local Plan policies that are applicable to the AAP area and ∓the following table therefore sets out the objectives and which AAP policies will contribute towards their achievement:	Clarity
MM166.	Table 2 Insert AAF		Appendix B	AAP Monitoring FrameworkObjectives and Policies Insert AAP Objective <u>12.</u> Maximise opportunities to bring in public sector and private sector funding. AAP Policies: <u>Del2</u>	Clarity and consistency
MM167.	B2	Appendix B	Appendix B	AAP Sustainability Objectives and Policies Insert additional Sustainability Objective cross-reference table (as appended)	Clarity
MM168.	B3-8	Appendix B	Appendix B	Monitoring Framework Delete Monitoring Framework table and replace with new table (as appended)	Clarity and consistency
		Appendix C	Superseded Policies Insert new Appendix C with Superseded Policies tables (as appended)	Clarity	

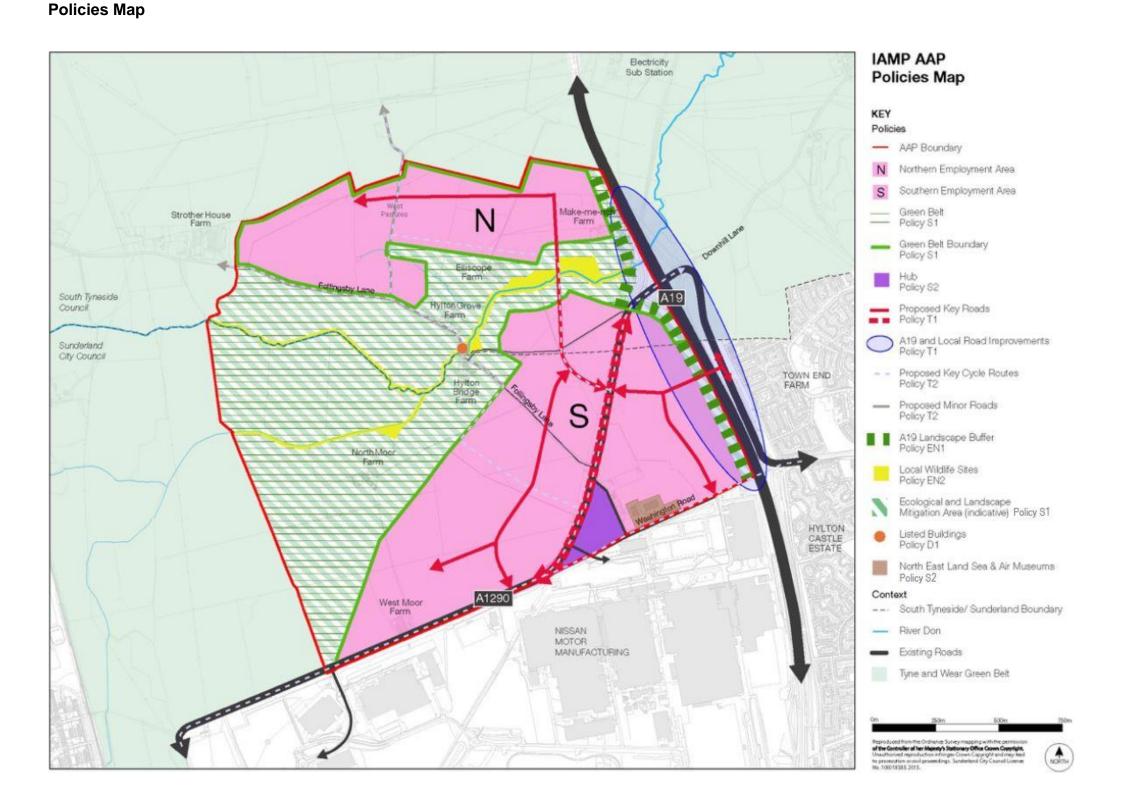
Proposed Changes to the Policies Map

Insert final updated Policies Map (as appended).

Changes include:

- Inclusion of wider Tyne and Wear Green Belt
- Addition of the inner Green Belt Boundary
- Inclusion of Listed Building
- Re-alignment of some of the proposed key internal roads
- Annotation of Northern and Southern Employment Areas
- Separation of policies and context in the key
- Re-alignment of inner Green Belt Boundary
- Annotation of key to include the word indicative after Ecological and Landscape Mitigation Area, together with the corresponding Policy
- Annotation of key to show the corresponding Policy for NELSAM

Removed Safeguarded land allocations



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Appendix A

Appendix B

AAP Monitoring Framework

Insert additional Sustainability Objectives table as follows:

AAP Sustainability Objectives and Policies

<u>Sus</u>	tainability Objective	AAP Policies
<u>1.</u>	Reduce the emissions of greenhouse gases within Sunderland and South Tyneside.	<u>D2, T2, T3</u>
<u>2.</u>	Adapt to and mitigate the impacts of climate change in Sunderland and South Tyneside.	<u>D1, D2, IN2</u>
<u>3.</u>	Protect our environmental assets and natural resources.	D2, EN1, EN2, EN3, EN4, Del1
<u>4.</u>	Conserve and enhance biodiversity.	EN1, EN2, EN3, Del1
<u>5.</u>	Protect and enhance our Green Belt and green infrastructure.	EN1, EN2, EN3, Del1
<u>6.</u>	Support the efficient use of resources and minimise disposal of wastes to landfill.	
<u>7.</u>	Facilitate economic growth at a local and regional scale.	<u>S1, S2, S3, S4, S5, D1, T1, T2, T3, T4, IN1</u>
<u>8.</u>	Increase the provision of diverse employment opportunities for all across Sunderland and South Tyneside.	<u>S1, S2, S3, S4, S5, D1</u>
<u>9.</u>	Increase opportunities for education and skills for Sunderland and South Tyneside.	<u>S1, S2, S3, S4, S5, D1</u>
<u>10.</u>	Improve health and well-being of people and communities.	<u>S5, T2, T3, EN3, EN4</u>
<u>11.</u>	Promote and enhance Sunderland and South Tyneside's culture and heritage.	<u>D1</u>
<u>12.</u>	Create an integrated strategic road and public transport network within Sunderland and South Tyneside and to the wider region.	<u>S5, D1, D2, T1, T2, T3, Del1</u>
<u>13.</u>	Promote sustainable transport choices for employees, residents and visitors.	<u>S5, D1, D2, T2, T3, Del1</u>

Insert replacement Monitoring Framework table as follows:

Monitoring Framework

Policy	Target/Outcome	Indicator	Trigger and Contingency	Source
<u>S1:</u>	Successful release of	Submission of DCO to PINs by	If the DCO is not submitted and subsequently	Council Adoption Statement
Comprehensive	150 hectares of land	Spring 2017 which includes	determined by 2020, both authorities will seek	
Development	from the Green Belt	masterplan, unifying design code	to prepare a joint Supplementary Planning	DCO Application
	for comprehensive	and phasing plan.	Document (SPD) which will establish the	
	development		overall masterplan and design code for the	Planning Applications or LDOs within AAP
		Determination of DCO by the	<u>site.</u>	area submitted under Town and Country
	Submission of DCO	Secretary of State by Autumn		Planning Act
	application to	<u>2018.</u>		
	<u>Planning</u>			
	Inspectorate	Submission and/or determination		
		of any planning applications		
	Determination of	(including LDOs) under the		
	DCO application by	provisions of the Town and		
	Secretary of State	Country Planning Act, which are		
		in accordance with IAMP		
	Submission and/or	masterplan, contributes		
	determination of	proportionately to mitigation and		
	planning application	achieves same design quality as		
	(including local	IAMP design code.		
	development orders)			
	under TCPA which			
	contributes positively			
	towards			
	comprehensive			
OD: Ore en Delt	development.		Once 500/ of the ellegated development lend	Councilla Local Dian Manitaring Database
S2: Green Belt and	When and if it is necessary to release	Take up of employment land	Once 50% of the allocated development land has been developed, a review of the AAP will	Council's Local Plan Monitoring Database
Safeguarded	safeguarded land for	(ha).	be undertaken to consider if it is necessary to	DCO Application
Land	development.	Proportion of overall allocated	release safeguarded land for development.	
Luna	development.	land which has been developed	release sureguarded land for development.	Annual Data provided by IAMP LLP
		(%).		
		(70)-		Updates to Sunderland and South Tyneside
				Employment Land Reviews
S2 : Principal	Development of	Amount of B1, B2 and B8	The Council should seek to ensure through	Council's Local Plan Monitoring Database
Uses	Principal Uses on the	floorspace completed (m^2)	the DCO or by imposing an Article 4 Direction	
	IAMP site		that no more than 10% of B-Class floorspace	DCO Application
		Proportion of this floorspace	is taken up by non-principal uses	
		which is for Principal Uses (as	<u></u>	Annual Data provided by IAMP LLP
		defined by the glossary)(%).		
				Planning Applications within AAP area

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Delley	Tarratio	Indiantar	Tringer and Contingency	Courses
Policy	<u>Target/Outcome</u>	Indicator	Trigger and Contingency	Source submitted under Town and Country Planning Act
S3: Mix of Uses	Amount of floorspace developed for Principal and Supporting	Amount of floorspace completed for supporting uses (B1(a) and B1(b)) (m ²)	Annual review of the proportion of take up of employment land for Principal and Supporting Uses.	Council's Local Plan Monitoring Database
	Supporting employment uses	Amount of floorspace developed	Where the amount of floorspace for	Annual Data provided by IAMP LLP
		for Principal Uses (B1(c), B2 and B8) (m ²)	Supporting Uses exceeds 20,000m ² or 20% of floorspace developed, an early review of the plan should be undertaken.	Planning Applications within AAP area submitted under Town and Country Planning Act
<u>S4: The Hub</u> <u>and Ancillary</u> <u>Uses</u>	Amount of floorspace developed for appropriate uses on the Hub and ancillary uses within the Northern Employment Area	Cumulative amount of floorspace developed for Use Classes C1, D2, B1(a), A1 and A3 within the Hub.Amount of floorspace developed for A1 and A3 Uses by single unit within the Hub and the Northern Employment Area.Number of bedspaces developed for C1 Use within the Hub.Amount of floorspace developed for nursery and child-care facilities.Completion of a multi-model transport interchange.	Where the cumulative amount of development exceeds the thresholds set out within Policy S5, consider whether necessary to introduce appropriate restrictions or whether an early review of the plan should be undertaken. Should any individual A1 or A3 Use units exceed 250m ² , consider whether necessary to introduce appropriate restrictions or whether an early review of the plan should be undertaken.	Council's Local Plan Monitoring Database DCO Application Annual Data provided by IAMP LLP Planning Applications within AAP area submitted under Town and Country Planning Act
<u>D1: Masterplan</u> <u>Design</u>	Submission of a Design Code which addresses all of the design principles set out within Policy D1.	Density of development on the Hub (proportion of site area developed by hectare). Cumulative amount of A1 and A3 Use Classes developed in the Northern Employment Area. Submission of a Design Code alongside the DCO or any relevant planning applications made under the Town and Country Planning Act which addresses each of the design principles set out within the Policy.	If the DCO is not determined by 2020, both authorities will seek to prepare a joint Supplementary Planning Document (SPD) which will establish the overall masterplan and design code for the site.	DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act
<u>D2: Public</u> <u>Realm</u>	Submission of a Public Realm Strategy which addresses all of the key principles set out within Policy D2.	Submission of a Public Realm Strategy alongside the DCO or any subsequent planning applications made under the Town and Country Planning Act which addresses each of the key principles set out within the Policy.	If the DCO is not determined by 2020, both authorities will seek to prepare a joint Supplementary Planning Document (SPD) which will establish the overall masterplan and design code for the site.	DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act
T1: Highway Infrastructure	Completion of necessary transport improvements as set out within Policy T1. Submission of a Phasing and Transport Assessment which demonstrates how the proposals will provide suitable and safe connection and integration with Highways England's junction improvements to the Downhill and Testos junctions on the A19.	Monitoring the delivery of the necessary transport improvements in line with the timescales in the Infrastructure Delivery Plan (IDP).	Review the IDP and the delivery mechanism if any of the transport schemes are delayed.	Infrastructure Delivery Plan Highways England Annual Data provided by IAMP LLP
<u>T2: Walking,</u> Cycling and Horse Riding	Submission of a Design Code which addresses all of the walking, cycling and horse riding design principles set out	Submission of a Design Code alongside the DCO or any subsequent planning applications made under the Town and Country Planning Act which addresses each of the	If the DCO is not determined by 2020, both authorities will seek to prepare a joint Supplementary Planning Document (SPD) which will establish the overall masterplan and design code for the site.	DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act

<u>Policy</u>	Target/Outcome	Indicator	Trigger and Contingency	<u>Source</u>
	within Policy T2.	design principles set out within the Policy.		
<u>T3: Public</u> Transport	Submission of details alongside the DCO and/or any planning application that all of the requirements within the policy have been met.	Submission of documentation alongside the DCO or any subsequent planning applications made under the Town and Country Planning Act which addresses each of the requirements set out within the Policy.	If the DCO is not determined by 2020, both authorities will seek to prepare a joint Supplementary Planning Document (SPD) which will establish the overall masterplan and design code for the site.	Nexus DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act
<u>T4: Parking</u>	Identification of parking standards as part of IAMP Design Code. Submission of Travel Plan alongside the DCO and/or any planning application that all of the requirements within the policy have been met.	Submission of Car Park Management Plan Provision of disabled badge parking spaces (no. provided and % of all spaces provided which are for use by disabled badge holders only). Proportion of off-street parking spaces provided for the use of car-sharing only (%). Total number of parking spaces provided. Number of spaces provided for lorry parking provision. Number of on-street parking bays provided. Number of charging points provided for electric cars and	If the DCO is not determined by 2020, both authorities will seek to prepare a Supplementary Planning Document (SPD) which will establish the overall masterplan and design code for the site, including the parking standards.	DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act Annual Data provided by IAMP LLP
N1:	Delivery of necessary	bicycles. Monitoring of the delivery of the	Review the IDP and the delivery mechanism if	Infrastructure Delivery Plan
Infrastructure Provision	infrastructure to support the delivery of the IAMP.	projects identified within the Infrastructure Delivery Plan.	any of the transport schemes are delayed.	Annual Data provided by IAMP LLP
IN2: Flood Risk and Drainage	Demonstration that there would be no net loss in floodplain storage capacity nor an increase in maximum flood levels within adjoining properties as a consequence of development. That run-off from the site (post- development) does not exceed corresponding greenfield rates, minimises pollution and provides multifunctional benefits to wildlife, landscape and water quality. That there is sufficient foul sewer network capacity, or the necessary upgrades are provided if insufficient	Submission of Flood Risk Assessment and Water Framework Directive Assessment as part of DCO or planning application. Submission of Surface Water Drainage Strategy as part of DCO or planning application. Water Quality Indicators for River Don. Delivery of any necessary foul sewer upgrades, as necessary.	If levels of flood risk on the site (as shown on Environment Agency's flood maps) increase as a result of the development, this will trigger an update to the SFRA to identify necessary mitigation to return flood levels to greenfield rates. If water quality along the section of the River Don through the IAMP and immediately downstream of the IAMP declines below current levels, the Councils will work with the Environment Agency to address the issues. If insufficient levels of sewer capacity are identified, the Councils will work with Northumbrian Water to rectify any deficiencies.	Environment Agency Flood Risk Assessment
<u>EN1:</u> <u>Landscape</u> <u>Design</u>	capacity exists.Establish landscapescreening arounddevelopmentconsisting of nativebroadleaf andevergreensSubmission oflandscape and visualimpact assessment	Landscape planting to be undertaken in accordance with agreed design principles for the site Submission of a landscape and visual impact assessment as part of the DCO or planning application, which addresses all of the criteria set out within the	Review of landscape plan and contract annually for the first three years and then every 3 years until planted stock suitably established. Stock to be replaced or changed if unable to establish. Tree thinning to take place every 10 -15 years for the life time of the development in accordance accepted good practice	Council's Local Plan Monitoring Database DCO Application Planning Applications within AAP area submitted under Town and Country Planning Act Annual Data provided by IAMP LLP

Policy	Target/Outcome	Indicator	Trigger and Contingency	Source
	which influences the	policy.	If the DCO is not determined by 2020, both	
	design of the		authorities will seek to prepare a joint	
	proposals to ensure	Depth of landscape buffer	Supplementary Planning Document (SPD)	
	that potential effects are avoided,	provided alongside A19 (m).	which will establish the overall masterplan and design code for the site, including landscape	
	minimised or	Depth of landscape buffer long	design.	
	mitigated.	provided along development		
		edges (m).		
		Number of buildings developed		
		incorporating green and brown		
		roofs and integrated green infrastructure and treatment.		
EN2: Ecology	Protect and enhance	Submission of an Ecological	Undertake assessments 5 years after	DCO Application
<u> </u>	biodiversity	Impact Assessment as part of	construction works commence on site then	
		the DCO or planning application,	every 5 years. Should the sites be in	Planning Applications within AAP area
	Avoid/mitigate and	which addresses all of the	unfavourable condition, habitat management	submitted under Town and Country Planning
	compensate adverse impacts and provide	criteria set out within the policy.	works will be undertaken to help meet the	Act
	net gains	Preparation and implementation	favourable objectives for the sites	Local Authority Countryside and Wildlife
	not gaine	of an appropriate long term	Undertake annual surveys once mitigation	Officers/Ecologists
	Submission of	management plan.	measures are complete and then every 5	
	Ecological Impact		years. Revise management regime as	Local Nature Partnership and Durham Wildlife
	Assessment which	Condition of Local Wildlife Sites	required	Trust
	ensures that the development	within and immediately adjacent to the AAP boundary –	Undertake annual breeding surveys once	
	maintains and	undertake condition	mitigation measures are complete and then	
	enhances biodiversity	assessments of all Local Wildlife	every 5 years. Annual inspection of nesting	
	and wildlife habitats.	Sites directly and indirectly	and roosting units. Revise management	
		affected by IAMP	regime as required	
	Ensure that all Local	Indortoko broadina kini a sa	To provide bill oppidel repeats for the first O	
	Wildlife Sites (inclusive of	in accordance with best practice	To provide bi- annual reports for the first 6 years once mitigation measures are complete	
	proposed) are in	guidelines	and then every 5 years. Check habitats have	
	favourable condition	<u></u>	been created and managed in accordance	
		Undertake annual surveys for	with planning permission and the agreed	
	Retain Barn Owl	barn owl and inspections of	management plan for the site	
	population on site	nesting and roosting units		
	Increase the area of local priority habitats	All planning applications to	To provide bi- annual reports in the first 6 years of the mitigation measures being	
	in accordance with	provide details to the Local	complete and then every 5 years. Should the	
	the agreed	Authority of habitat type and total	species richness of the features be poor or	
	management plan for	area created	decline over time amend maintenance plan	
	<u>the site</u>		If the DOO is not determined by 2000 hoth	
	Swales and	Undertake native planting to complement the SuDS feature(s)	If the DCO is not determined by 2020, both authorities will seek to prepare a joint	
	Sustainable Drainage	and measure size of areas.	Supplementary Planning Document (SPD)	
	Systems (SuDS) to		which will establish the overall masterplan and	
	provide and take		design code for the site, including the	
	account of additional		ecological mitigation and a long term	
EN3: Green	wildlife benefits Provision of green	Depth of landscape buffer	management plan. If the DCO is not determined by 2020, both	DCO Application
Infrastructure	and open spaces for	provided alongside A19 (m).	authorities will seek to prepare a	
<u>initial actual o</u>	recreational use		Supplementary Planning Document (SPD)	Planning Applications within AAP area
	within the	Delivery of new ecological	which will establish the overall masterplan and	submitted under Town and Country Planning
	development.	mitigation area alongside River	design code for the site, including the green	Act
		Don.	infrastructure requirements.	Local Authority Countryside and Wildlife
		Amount of open space provided		Local Authority Countryside and Wildlife Officers/Ecologists
		(ha)		<u></u>
				Local Nature Partnership and Durham Wildlife
				Trust
EN4: Amenity	Submission of	No. of complaints to local	If more than 10 justified complaints are	Planning application/ Consultation on the DCO
	Construction Environmental	authorities Environmental Protection Officers as a result of	received by the Councils' Environmental Health Officers from different individuals within	Local Authority Environmental Health Officers
	Management Plan to	amenity impact resulting from	a given year, the Councils will seek to take	
	demonstrate that	proposed development.	necessary measures to resolve conflicts	
	appropriate mitigation		through mediation with developers and	
	measures are	Submission of a Construction	complainants.	
	implemented to protect amenity.	Environmental Management Plan as part of the DCO or		
		planning application, which		
		identifies and implements		
		appropriate mitigation measures		
		appropriato magador modouroo		
		relating to amenity.		
	Quebra inclusión (relating to amenity.		
Del1: Phasing	Submission of Phasing Strategy	relating to amenity. Delivery of the development in	If the development is not brought forward in	DCO Application
and	Phasing Strategy,	relating to amenity. Delivery of the development in accordance with the Phasing	accordance with the Phasing Strategy.	
		relating to amenity. Delivery of the development in		DCO Application Planning Applications within AAP area submitted under Town and Country Planning

Policy	Target/Outcome	Indicator	Trigger and Contingency	Source
	comprehensive			
	development.			IAMP LLP
Del2: Securing	Levels of mitigation	Number of planning conditions	Review the IDP and the delivery mechanism if	DCO Application
Mitigation	achieved through	and obligations linked to	any of the mitigation schemes are delayed.	
	articles, protective	environmental mitigation.		Planning Applications within AAP area
	provisions and			submitted under Town and Country Planning
	requirements of the	Amount of money		Act
	DCO or other	agreed/received through		
	planning obligations.	planning contributions towards		
		environmental mitigation.		
		Delivery against the		
		Infrastructure Delivery Plan		
Other 1:	Levels of additional	Numbers and proportions of	If in-migration levels significantly differ (>10%	IAMP LLP and NELEP
Migration and	in-migration and	IAMP employees moving into the	higher or lower overall and in terms of the	
Housing	housing needs	North East of England from	distribution between districts) from the levels	<u>SHMAs</u>
	generated by the	elsewhere to take up jobs within	predicted in the IAMP Impact Study, then	
	IAMP	the IAMP:	review the study's recommended growth	
		i) within B-Class uses;	scenarios and/or review the Impact Study	
		ii) within the Hub's uses.	<u>itself.</u>	
		iii) where they moved to the NE		
		region from;		
		iv) which NE districts they have		
		moved to live in.		
Other 2:	Employment land	Where IAMP occupier	If displacement levels significantly differ	IAMP LLP and NELEP
Employment	<u>needs – levels of</u>	businesses have moved from to	(>10% higher or lower) from the overall levels	
	displacement and	relocate within the IAMP.	predicted in the IAMP Impact Study then	Employment Land Reviews
	multiplier effects		review the study's recommended growth	
	generated by the		scenarios and/or review the Impact Study	
	IAMP		itself.	

Appendix C

Superseded Policies

Sunderland Unitary Development Plan – Superseded Policies ('saved' UDP policies)

UDP Saved Policy	Replacement Policy from IAMP AAP	Superseded (Part / Full)
WA19 Green Belt	Policy S2: Green Belt and Safeguarded Land	Part
CN23 Wildlife Corridor	Policy EN2: Ecology	Part
WA26 Multi-user route along the River Don	Policy T2: Walking and Cycling	<u>Part</u>

South Tyneside Local Development Framework – Superseded Policies (Core Strategy, Development Management and Site-Specific Allocations policies)

Core Strategy	Replacement Policy from IAMP AAP	Superseded (Part / Full)
EA1: Local Character and Distinctiveness	Policy S2: Green Belt and Safeguarded Land	Part (related to Core Strategy Key Diagram and LDF Site- Specific Allocations Proposals Map)

Proposed Changes to the Policies Map

Changes include:

- Inclusion of wider Tyne and Wear Green Belt
- Addition of the inner Green Belt Boundary
- Inclusion of Listed Building
- Re-alignment of some of the proposed key internal roads
- Annotation of Northern and Southern Employment Areas
- Separation of policies and context in the key
- Re-alignment of inner Green Belt Boundary
- Annotation of key to include the word indicative after Ecological and Landscape Mitigation Area, together with the corresponding Policy
- Annotation of key to show the corresponding Policy for NELSAM

Removed Safeguarded land allocations