

Proposed Battery Plant, IAMP Planning Statement

Envision AESC UK Ltd

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1.0 Introduction

Purpose of the Statement

1.1 This Planning Statement has been prepared by Lichfields on behalf of Envision AESC UK Ltd ('the applicant') to accompany a full planning application for the development of land to the west of International Drive and north of the A1290 at the International Advanced Manufacturing Park ('IAMP'), Washington.

1.2 The description of development is as follows:

"Erection of industrial unit to be used for the manufacture of batteries for vehicles with ancillary office / welfare floorspace and associated infrastructure provision, accesses, parking, drainage and landscaping."

1.3 Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Statement considers the application's conformity with relevant national planning policy, the adopted local plan and other material considerations.

Background

The Applicant

1.4 Envision AESC is a world leading manufacturer of lithium-ion batteries for the automotive industry and has been producing highest quality batteries in Sunderland for the Nissan LEAF electric vehicle for 9 years. The business is headquartered in Japan, but also has manufacturing sites in China, the United States and here in Sunderland where 300 people are employed.

1.5 As the demand for electric vehicles is forecast to grow significantly over the coming years, supporting the transition to a net zero carbon future, additional capacity for battery manufacturing is needed. To meet this increased future demand, Envision AESC is proposing to invest in a new manufacturing facility that will be capable of producing batteries for more than 100,000 electric vehicles per year.

1.6 This is a unique and most exciting opportunity to help Sunderland and the UK become one of the best international locations for automotive and advanced manufacturing. The proposals will help ensure that Envision AESC, the IAMP and Sunderland are at the forefront of innovations in battery technology and are playing a critical role in leading the de-carbonisation revolution through the promotion of clean energy and new energy electric vehicles.

1.7 The proposals are to relocate the 300 jobs from the existing battery plant at the current Envision AESC facility to a new larger state-of-the art facility, which will employ a total of 1,000 staff (including the existing staff). Subject to planning permission, it is proposed that construction would start in early 2022, with the first battery production in 2024. Several options are under consideration for how the existing plant will be utilised once the proposed development is operational and the outcome of this review will determine how many of the current workforce do transition to the new plant.

Context

1.8 IAMP is allocated within the IAMP Area Action Plan (adopted November 2017) for up to 392,000 sqm of advanced manufacturing and automotive uses on 150 hectares of land, with 110 hectares of land designated for ecological and landscaping mitigation. IAMP is split into two employment areas: a Northern Employment Area and a Southern Employment Area as defined

by the IAMP Area Action Plan ('AAP'). These employment areas are separated by a belt of agricultural land which lies within the Green Belt. This land is to be delivered as an Ecological and Landscape Mitigation Area (ELMA). The River Don and its tributary (Usworth Burn) runs through the centre of the ELMA. Of the 110 hectares of land for the ELMA, 43.6 hectares relate to IAMP ONE and 66.4 hectares relate to IAMP TWO.

- 1.9 The first phase of IAMP, known as IAMP ONE, was granted planning permission in May 2018¹ for up to 156,840 sqm of floorspace for automotive and advanced manufacturing uses (around 1.69 million sqft) (hereinafter referred to as the 2018 IAMP ONE permission). To date, three buildings and the internal spine road (known as International Drive) have been completed, whilst the IAMP ONE Ecological and Landscape Mitigation Area ('ELMA') has been created.
- 1.10 Within IAMP ONE, planning permission was granted for a reconfiguration of land to allow the occupancy of larger units (up to 1m sqft) in June 2020² (hereinafter referred to as the 2020 IAMP ONE permission). This application is known as IAMP ONE Phase 2. It included part of IAMP ONE that already has planning permission, as well as a further triangular area of land to the south west which would provide extra development land. The overlap is shown on Figure 1.1.

Figure 1.1 Overlap between the IAMP ONE permission boundary and the IAMP ONE Phase 2 application boundary



Source: © Google Earth

- 1.11 The reason for the IAMP ONE Phase 2 application was to provide greater flexibility in the size and location of units coming forward and to allow the full extent of IAMP ONE to be delivered, in this strategic location as set out in the IAMP Area Action Plan (AAP).
- 1.12 The IAMP ONE Phase 2 application did not seek to increase the amount of floorspace above that already approved through the IAMP ONE permission. The purpose of adding the triangular area of land is to increase flexibility in the development layout, not to increase floorspace.

¹ Local Planning Authority application reference: 18/00092/HE4

² Local Planning Authority application reference: 20/00556/OU4

- 1.13 The proposed battery plant lies within IAMP ONE Phase 2. This planning application proposes 108,615sqm of floorspace which is 9677.8sqm higher than the previously approved total for IAMP ONE. The key reason for the floorspace cap as part of the previous planning applications was to prevent a harmful impact on the strategic highway network in advance of the A19 / A1290 Downhill Lane junction improvements taking place. However, as explained in Chapter 5.0 of this report, as well as within the Transport Statement and Access and Transport Chapter of the Environmental Statement (ES), due to the nature of operations within the facility the staff numbers will be less than those assessed in the traffic generation assumptions for the 2018 IAMP ONE and 2020 IAMP ONE Phase 2 projects. This is because the highly automated processes to be deployed means that staff numbers are relatively low compared to the floor area. Furthermore, large areas are not accessible to staff and will be used solely for housing plant. As such, even though the floorspace will be higher, the number of vehicle movements will be less, and hence the impact on the highway network will be less than that previously assessed and consented. Out of the total floorspace, 3,750sqm of ancillary office accommodation will be provided.

Purpose of this Statement

- 1.14 The purpose of this Statement is to assess the proposed development against the Development Plan for Sunderland and material considerations including relevant national planning policy, which establishes a presumption in favour of sustainable development.

Accompanying Documentation

- 1.15 This Statement should be read in conjunction with the complete suite of documents and plans which accompany the planning application.
- 1.16 The scope of the planning application has been determined in accordance with both the national validation requirements and the “*Sunderland City Council Validation of Planning Applications 2016*” document (October 2016). The scope has been agreed with the Sunderland City Council (‘the Council’) Planning Service through pre-application discussions.
- 1.17 The following documents are provided to comply with national validation requirements:
- Application Form;
 - Ownership Certificates and Agricultural Land Declaration;
 - Location Plan (drawing number: 100 Revision P01)
 - Existing Site Plan (drawing number: 100 Revision P01)
 - Design and Access Statement, prepared by RPS; and
 - Planning application fee.
- 1.18 In addition, the following documents have also been submitted in order to assist the Council in the determination of the planning application:
- Planning Statement (this document), prepared by Lichfields;
 - Health Impact Assessment, prepared by Lichfields;
 - Heritage Impact Assessment, prepared by Lichfields;
 - Statement of Community Involvement, prepared by Lichfields;
 - Draft Design Code for the IAMP Development, prepared by Urbed;
 - Environmental Statement (ES), prepared by Wardell Armstrong;
 - Flood Risk and Drainage Assessment, prepared by Systra (included in ES);

- Transport Assessment, prepared by Systra (included in ES);
- Framework Travel Plan, prepared by Systra (included in ES);
- Highways Operational Management Plan – Envision Chapter, prepared by Systra;
- Stage 1 Road Safety Audit, prepared by Systra;
- Initial Public Transport Strategy, prepared by the IAMP LLP;
- Ecological species surveys, prepared by Ecology Solutions, DWS and E3 Ecology (included in ES);
- Energy Statement, prepared by Wardell Armstrong (included in ES);
- Sustainability Statement, prepared by Wardell Armstrong (included in ES);
- Glint and Glare Assessment, prepared by Wardell Armstrong (included in ES);
- Pre-Development Arboricultural Report for IAMP, prepared by Dendra;
- Land at West Moor Farm Archaeological Evaluation, prepared by AD Archaeology (included in ES);
- IAMP ONE Ground Investigation Report, prepared by AECOM;
- Geoenvironmental Appraisal for IAMP ONE, prepared by Dunelm; and
- Factual Report on Site Investigations for land at IAMP, prepared by Dunelm.

1.19

Table 1.1 provides details of the chapters and appendices contained in the ES.

Table 1.1 ES Chapters and Appendices

Chapter	Chapter Title	Appendices
1	Introduction	Appendix 1.1: IAMP ONE Phase Two Environmental Statement (2020) Appendix 1.2: Conditions to Planning Consent (20/00556/OU4)
2	Scope and Methodology	None
3	Site and Scheme Description	Appendix 3.1: Process Overview Appendix 3.2: Sustainability Statement Appendix 3.3: Energy Statement Appendix 3.4: Glint Assessment
4	Planning Policy Context	None
5	Community Consultation and Consideration of Alternatives	Appendix 5.1: Public Consultation 2021
6	Air Quality	Appendix 6.1: Air Quality Legislation and Guidance Appendix 6.2: Methodology for Construction Phase Assessment Appendix 6.3: Methodology for Operation Phase Assessment Appendix 6.4: Operational Phase Assessment Results Appendix 6.5: Professional Experience of Assessors
7	Noise	None
8	Landscape and Visual Impact Assessment	Appendix 8.1: LVIA Methodology
9	Waste	None
10	Water Resources	Appendix 10.1: Flood Risk Assessment and Drainage Strategy Appendix 10.2: Environment Agency Monitoring Data, River Don
11	Geology and Soils	None
12	Ecology and Biodiversity	Appendix 12.1: Ecological Appraisal, IAMP ONE Phase Two, E3 Ecology Ltd, February 2020 Appendix 12.2: West Moor Farm Ecological Impact Assessment Bat and Barn Owl Report, DWS Ecology, April 2021 Appendix 12.3: Interim Bat Survey Report, Ecology Solutions, June 2021 Appendix 12.4: Wintering Birds Survey, Final Report, IAMP, Durham Wildlife Services, May 2019

Chapter	Chapter Title	Appendices
		Appendix 12.5: Breeding Birds Survey Report, Ecology Solutions, June 2021 Appendix 12.6: Biodiversity Net Gain Assessment, Ecology Solutions, June 2021
13	Access and Transport	Appendix 13.1: Transport Statement Appendix 13.2: Framework Travel Plan
14	Vulnerability to Major Accidents and Disasters	None
15	Climate Change	Appendix 15.1: Legislation & Planning Policy Appendix 15.2: Assessment Methodology
16	Archaeology and Cultural Heritage	Appendix 16.1: Land at West Moor Farm Archaeological Evaluation (May 2021)
17	Cumulative Effects	None
18	Summary and Conclusions	None
19	Glossary	None

1.20 Table 1.2 provides details of the drawings and visuals that have been submitted to accompany the application.

Table 1.2 Schedule of Drawings and Visuals

Drawing Name	Drawing Reference	Revision
Proposed Site Plan	101	P02
Existing and Proposed Site Sections	102	P03
Proposed Landscape Plan	103	P03
Proposed Site Layout	104	P02
Proposed Factory Elevations	105	P01
Proposed Factory Plans	106	P02
Proposed Factory Roof Plan	107	P01
Proposed Gatehouse Elevations	108	P01
Proposed Gatehouse Plan	109	P01
Proposed Bulk Stores Canopy Elevations	110	P01
Proposed Bulk Stores Canopy Plan	111	P01
Proposed Waste Collection Canopy Elevations	112	P01
Proposed Waste Collection Canopy Plan	113	P01
Proposed Sprinkler Tank and Pump House Elevations	114	P01
Proposed Sprinkler Tank and Pump House Plan	115	P01
Proposed 3D Visualisation (View 1)	116	P01
Proposed 3D Visualisation (View 2)	117	P01

Structure

1.21 The remaining Chapters of this Statement are structured as follows:

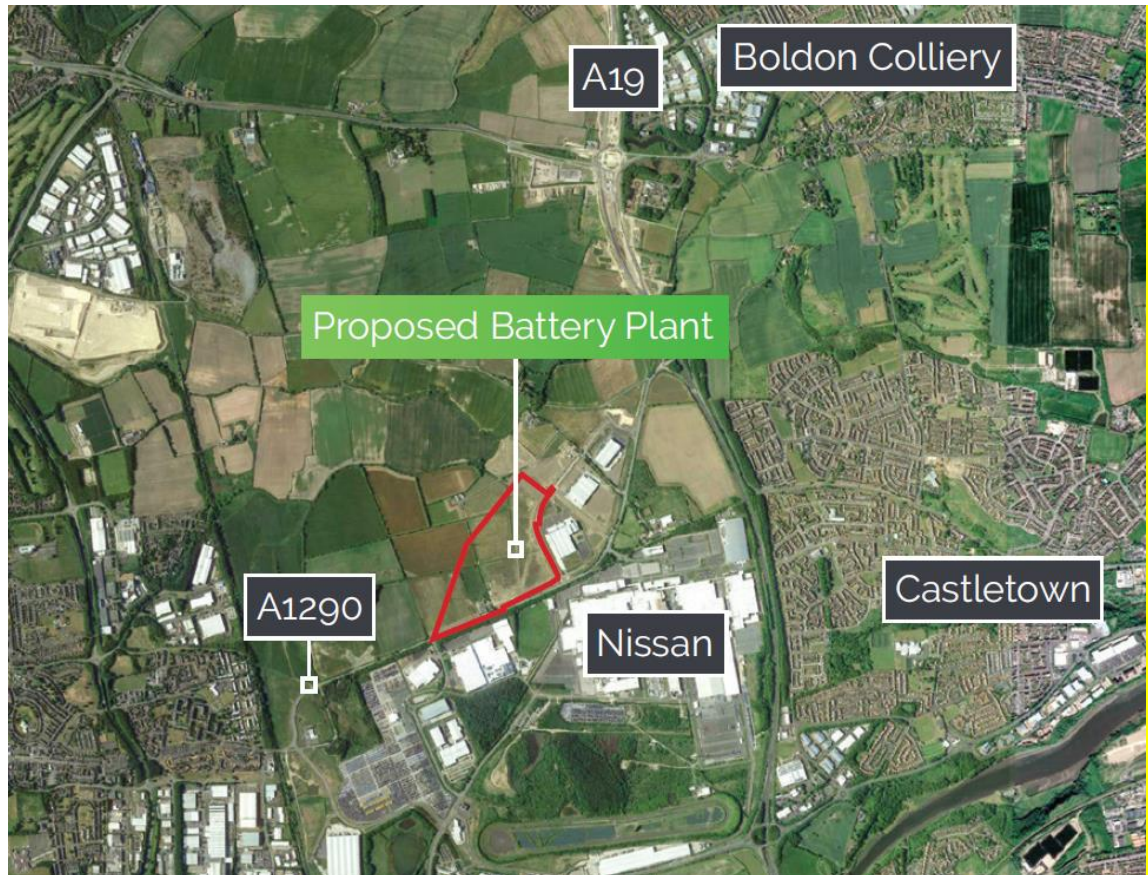
- Chapter 2: Site Context;
- Chapter 3: The Proposed Development;
- Chapter 4: Planning Policy Context;
- Chapter 5: Planning Assessment;
- Chapter 6: Compliance with the Draft IAMP Design Code; and
- Chapter 7: Conclusion.

2.0 Site Context

The Site

- 2.1 The application site comprises approximately 25 ha of land and lies at the south-western end of the Southern Employment Area ('SEA') within the IAMP ONE site boundary.
- 2.2 The redline boundary of the application site is shown on Figure 2.1

Figure 2.1 The Application Site



Source: © Google Earth

- 2.3 The site primarily consists of arable agricultural land and several vacant buildings at West Moor Farm, which was acquired by IAMP LLP in 2017. To allow for the comprehensive development of IAMP, the demolition of West Moor Farm was previously approved by the Council as part of the IAMP ONE Phase Two planning permission. However, a separate application for the demolition works has been brought forward due to repeated and ongoing incidents of anti-social behaviour and vandalism taking place at the site. This application is currently with the Council for consideration (planning reference 21/01330/FUL).
- 2.4 Existing field boundaries within the site include hedgerows with occasional trees. West Moor Farm faces south onto the A1290 which is separated by a timber fence and trees. The land is largely level with only minor variations in elevation.
- 2.5 There is an existing access to the A1290 from West Moor Farm which is located approximately 300m to the east of the junction with Cherry Blossom Way into the Nissan site from the A1290. The site also incorporates an access track linking northwards to North Moor Farm.

Figure 2.2 View of the proposed development site from the north-east of the site looking south-west



The Surrounding Area

- 2.6 The immediate surrounding area is currently defined by a range of agricultural and industrial uses. The site is bounded by the A1290 to the south with a dense tree belt screening much of the industrial development beyond. Wind turbines and the roofs of factory units can however be glimpsed to the south above the tree line from north-east corner of the site.
- 2.7 The site is bound by International Drive to the east, which has recently been constructed and provides the internal spine road through IAMP ONE. A drainage ditch and newly planted shrubs separate the site from the road. Large industrial warehouses which have been recently constructed as part of the IAMP ONE development lie beyond International Drive to the east.
- 2.8 Two recent photographs are provided overleaf which show the three bespoke manufacturing buildings which have been completed within IAMP ONE, together with International Drive. Two of the buildings are occupied by Nissan's suppliers (SNOP and Faltec). The third building, which was to be occupied by the Centre of Excellence in Sustainable Advanced Manufacturing ('CESAM'), has been temporarily fitted out as a Nightingale hospital in response to Covid-19 and is currently being used as a temporary vaccination centre.

Figure 2.2 Photograph of the three industrial units looking westwards, with the Site for the Proposed Battery Plant, including West Moor Farm, in the background



Figure 2.3 Photograph of the three industrial units looking eastwards with the new spine road in the foreground



- 2.9 Agricultural land bounds the application site to the north and west, with North Moor Farm located a short distance to the north. A high voltage overhead power line (275kV) carried on pylons runs from south-west to north-east just beyond the site's northern and western boundaries. An application is currently being considered by Sunderland City Council for the diversion of these overhead powerlines (application reference 21/01670/S37).
- 2.10 The residential areas of Sulgrave and Usworth Hall are located over 1km to the west and those of Town End Farm and Hylton Castle are over 1.5km to the east.

Figure 2.4 Agricultural land to the north



Figure 2.5 Industrial character of the setting to the east of the site

Transport Network

2.11

The A1290 forms the southern boundary of the application site. Minor improvements including localised widening at the northern junction with International Drive have taken place as part of the IAMP ONE Phase One permission. In due course, the A1290 will be widened to dual carriageway as part of the road improvements associated with IAMP TWO.

- 2.12 The A19 (T) is located approximately 1 km to the east of the site and is one of the region's key north-south routes. The A194 (M) (orientated south-west to north-east) is located approximately 2.5-3 km to the north-west of the site. In addition, a network of 'A' roads and more minor roads also provide connections to and within the nearby settlements.

Designations

- 2.13 Relevant designations within the vicinity of the application site are described below in Table 2.1, although this is not an exhaustive list.

Table 2.1: Planning Designations

Type of Designation	Name and Proximity to the Application Site
Ecological Designations	<ul style="list-style-type: none"> • Durham Coast SSSI; Durham Coast SAC; Northumbria Coast RAMSAR; Northumbria Coast SPA: Approximately 8.9km to the north east • Hylton Castle Cutting SSSI: Approximately 2.9km to the east • Wear River Bank SSSI: Approximately 2.9km to the south east • There are a range of Local Wildlife Sites within 2km of the site including Usworth Burn, Elliscope Farm / Hylton Bridge, Strother House Farm, Severn Houses and Barmston Pond. Further details are provided in the Ecology and Biodiversity Chapter of the Environmental Statement
Ancient/Scheduled Monuments	<ul style="list-style-type: none"> • Hylton Castle: Approximately 2.8km to the east • Colliery Engine House: Approximately 2.9km to the south west
Listed Buildings/Structures	<ul style="list-style-type: none"> • Penshaw Monument (Grade I): Approx. 4.2km to the south • Hylton Grove Bridge (Grade II): Approx. 1.1km to the north east • Usworth Hall (Grade II): Approx. 1.6km to the north west • Low Barmston Farmhouse (Grade II): Approx. 1.8km to the south • Downhill Farm (Grade II): Approx. 2.5km to the north east • Hylton Chapel (Grade I): Approx. 2.8km to the east
Flood Risk Zone	<ul style="list-style-type: none"> • The majority of the application site lies within Flood Zone 1 and is not at risk of flooding from the seas, rivers or reservoirs. There are no watercourses or waterbodies within the site. Flood Zone 2 encroaches onto the northern end of the proposed development and affects part of the site entrance off International Drive.

Planning History

- 2.14 The recent planning history of IAMP and the immediate area is summarised in Table 2.2 overleaf.

Table 2.1 Recent Planning History

Address	Planning App Ref. Number	Type of Application	Description of Development	Current Known Status
IAMP ONE Phase One ^[1] , Washington.	18/00092/HE4	Hybrid planning application	<p>Full planning permission for light industrial, general industrial and storage or distribution (Class B1(c), B2 and B8), with ancillary office and research and development floorspace (Class B1(a) and B1(b)) with associated access, parking, service yards and attenuation basins, as well as the temporary construction route, internal spine road, utility diversions, with two accesses onto the A1290 and associated infrastructure, earth works and landscaping (under construction).</p> <p>Outline planning permission for the erection of industrial units for light industrial, general industrial and storage or distribution (Class B1(c), B2 and B8) with ancillary office and research and development floorspace (Class B1(a) and B1(b)) with internal accesses, parking, service yards, attenuation basins, electricity substations, foul pumping station, realignment of the access road to North Moor Farm and associated infrastructure, earthworks and landscaping (All Matter Reserved).</p> <p><i>Comment - The first unit (SNOP) and infrastructure, as well as the ecological mitigation area, have been delivered.</i></p>	Approved May 2018.
	19/00245/REM	Reserved matters application	<p>Reserved matters approval for the access, layout, scale, appearance and landscaping of the development for Plot 4 of hybrid planning application 18/00092/HE4.</p> <p><i>Comment - this unit has been built and is occupied by Faltec.</i></p>	Approved May 2019
	19/00280/REM	Reserved matters application	<p>Reserved matters approval for the access, layout, scale, appearance and landscaping of the development for Plots 5 and 6 of hybrid planning application 18/00092/HE4.</p> <p><i>Comment - this unit has been built and has temporarily been fitted out as a Nightingale Hospital and is currently being used for the vaccination roll out.</i></p>	Approved April 2019
IAMP ONE Phase Two ^[1] , Washington	20/00556/OU4	Outline planning application	Erection of industrial units (up to 98,937.2sqm) (Gross Internal Area) for light industrial, general industrial and storage & distribution uses (Class B1(c), B2 and B8) with ancillary office and research & development floorspace (Class B1(a) and B1(b) with internal accesses, parking, service yards, electricity sub-stations, attenuation basins and associated infrastructure, earthworks and landscaping, as well as the demolition of the existing buildings at West Moor Farm. (All matters are Reserved for future approval)	Approved June 2020
^[1] A total of 156,840 m ² (Gross Internal Area (GIA)) of floorspace has been approved for IAMP ONE and 57,902.8 m ² GIA of floorspace has already been built out for IAMP ONE Phase 1. The floorspace for IAMP ONE Phase 2 (i.e. the Proposed Development) will form part of the 156,840 m ² GIA total (rather than be additional to this value).				

Address	Planning App Ref. Number	Type of Application	Description of Development	Current Known Status
Usworth Cottages and Chalet, IAMP TWO	20/01915/FUL	Full planning application	Demolition of numbers 1 to 5 Usworth Cottages and the Chalet, including associated garages and outbuildings. <i>Comment – these buildings have been demolished.</i>	Approved November 2020
Elliscope Farm, IAMP TWO	ST/1013/FUL	Full planning application	Demolition of the buildings at Elliscope Farm consisting of the main farm house, barns and chicken coop, with associated barn owl and bat mitigation including a wildlife tower.	Pending Consideration
West Moor Farm, IAMP ONE	21/01330/FUL	Full planning application	Demolition of the buildings at West Moor Farm	Pending consideration.
Three Horseshoes, Washington Road, IAMP TWO	18/01869/FUL 19/02161/VAR	Full planning application and variation of condition.	Proposed three-storey 36 bed hotel with parking on land adjacent to the Three Horseshoes, Washington Road (variation of condition application ref. 19/02161/VAR forms part of this application).	Approved October 2019. Approved March 2020
A19 Downhill Lane Junction Improvements	TR010024	Development consent order (DCO).	Project to enhance capacity of junction to support the IAMP. Includes construction of new bridge to south of existing (A1290) bridge across the A19 to create a more traditional roundabout layout above the A19. New slip roads will connect the A19 to the south.	Approved July 2020.

3.0

The Proposed Development

3.1

Full planning permission is sought for the following development:

“Erection of industrial unit to be used for the manufacture of batteries for vehicles with ancillary office / welfare floorspace and associated infrastructure provision, accesses, parking, drainage and landscaping.”

3.2

The proposed development consists of a single, three-storey industrial unit (Class B2) that is to house battery manufacturing facility, comprising of two battery manufacturing areas separated by a central spine of offices. The facility will have an annual maximum production capacity of 9 GWh.

3.3

The proposed facility will manufacture lithium-ion battery pouch cells and modules for electric vehicle (and other applications) via four production areas comprising of: electrode manufacture; cell production; formation and testing; and module assembly. The facility will employ 1,000 staff consisting of 848 shift-based staff and 152 day-based (office) staff. Envision will operate a four-shift pattern, whereby staff will work in four teams across two rotating 12-hour shifts. This means that there will be 212 shift-based staff on site at anyone time, plus the 152 office / administration / managerial staff. This provides a total of 364 staff. During the 30 minute hand over period, there will be 424 staff onsite. As the shift changes times are 06:00 and 18:00 the vast majority of office staff will not be on-site at the shift change over times.

3.4

The proposed development will be of a modern design set within a landscaped plot, supported by necessary vehicle parking, loading/unloading bays and manoeuvring areas. The building itself will be operated over a 24-hour, 7-day week period and, as such, external operational areas will require to be lit during the hours of darkness to the minimum levels required for their safe operational use. The building will also incorporate the latest design specifications for energy efficiency and the use of sustainable resources.

Design

3.5

The cladding system comprises of a metal profiled system in a pure grey/hamlet colour. The same palette of materials and colours will be applied to all buildings within the site. This consistency in design will help to visually harmonise the wider IAMP site, as well as within the wider campus including Nissan to the south.

3.6

To add interest, individually designed office elevations will be developed where staff and visitor interactions will be regular. This will help to provide a more human scale to the elevation, providing visual interest when closely interacting with the building fabric.

3.7

All curtain walling, ribbon windows, doors and louvres will be finished to contrast and compliment the wall cladding colours. Curtain wall glazing will be used on the entrance zones to add visual interest and prestige. The glazing highlights the entry to the building, reducing the need for unnecessary signage and visual clutter.

3.8

The roof will be expressed as two low pitched barrels with eaves containing a hidden gutter detail and permanent edge protection provided with handrail system. Photovoltaic panel arrays will be incorporated into the roof design.

3.9

The selection, detailing and maintenance of all external materials was considered at the outset of the original design process and only products with proven lifespan and quality will be specified.

- 3.10 The selection of materials will have due regard to the embodied energy for construction, environmental impact and ongoing maintenance. The use of recyclable materials, renewables and low carbon sources will be considered and implemented where appropriate.
- 3.11 External plant and process equipment has either been contained within the building volume, within dedicated plant rooms or screened behind louvres to ensure they remain screened from view.

Figure 3.1: Proposed Factory Elevations



Source: RPS

- 3.12 The building will be 248.5m x 385.2m at the widest points, with its height being as follows:
- Upper ridge: 30m+ handrail, walkways and PV;
 - Lower Ridge: 16.5m + handrail, walkways and PV; and
 - Eaves: 26.5m & 13m.
- 3.13 The tallest part of the process is on the west of the building, where the roof height has been set to 30m to the ridge, with only a small number of flues, perimeter handrails and solar PV panels projecting beyond this point. This building height is the same as the maximum building height accessed within the 2020 IAMP ONE Phase 2 ES and which was approved as part of that planning permission. Indeed, 'Building Heights Parameters Plan 4' is listed as an approved drawing under condition 3 of the 2020 permission.
- 3.14 The manufacturing plant has various types of processes in a linear route which sets the height requirements for different parts of the building. These building heights have been rationalised to create a simple and legible building form, the roof height varies to provide an efficient building skin to the overall process and ensures that rainwater management is efficient and robust due to the sensitivity of the internal process to water ingress.
- 3.15 The lower part of the manufacturing building roof is 16.5m and smaller ancillary stores and goods in and goods out areas project beyond the main building footprint to help provide relief to the building elevations.
- 3.16 Stair cores, principally provided for fire escape and fire authority access have been placed on the building perimeter, projecting from the elevations and also help to provide some relief to the elevations to break down the overall building mass.
- 3.17 The proposed development will be designed with a view of achieving a BREEAM 'Very Good' rating and hence the impacts of the project will be considered from a lifecycle perspective (i.e. from concept stage through to a fully constructed building). This includes driving sustainable building approaches and technologies.

- 3.18 Solar PV panels are proposed on the roof of the building and will be the primary means of reducing carbon emissions, along with Air Source Heat Pumps (ASHPs) in the office areas, improved fabric efficiency and potentially Waste Water Heat Recovery ('WWHR').

Access and Parking

- 3.19 Access to the site will be from the A1290 via International Drive, whilst an emergency access will be provided onto the A1290 to the south. At the main site entrance, separate access lanes are provided for car and HGVs / delivery vehicles.
- 3.20 Once within the site, any cars would travel into the car park or to the drop off / pick up area near the main entrance to the building, whilst the HGVs / service vehicles would travel through a gatehouse and along an access route which travels around the eastern, southern and western sides of the buildings. Signage would be provided to direct vehicles to the correct areas. A separate access lane is provided for any emergency vehicles adjacent to the gatehouse.
- 3.21 The car park includes 685 spaces for staff and 40 spaces for visitors, which provides a total of 725 spaces. Of these, 37 (5%) would be accessible located adjacent to the main entrance. The development also makes provision for 40 electric vehicle ('EV') points, with provision to increase to 80 if future demand requires.
- 3.22 Provision for pedestrians and cyclists has been incorporated into the overall layout of the development area. A cycle shelter, which accommodates up to 80 bicycles / motorcycles, is proposed close to the main entrance to the building. The level of cycle parking provision will be continuously monitored and reviewed. If necessary, provision will be increased if demand begins to approach capacity.
- 3.23 The expectation is that the daily movement of construction staff will, wherever possible, take place via multi-occupancy trips using car sharing. Given the nature of the working patterns in the construction industry, these trips can be anticipated as occurring outside of the typical peak commuting periods.

Landscaping / Ecology

- 3.24 The landscape strategy is to retain existing landscape assets and incorporate them into the development wherever possible. The landscaping scheme includes trees, hedgerows, shrubs, grasses and large swathes of wild flowers to provide seasonal interest, optimise biodiversity, enhance legibility and create an attractive and welcoming environment. The landscaping proposals (as shown on Drawing 103 P03 - Proposed Landscape Plan) include the following:
- Screen planting of indigenous trees and shrubs around the perimeter of the site, including a percentage of grey poplar in addition to native woodland species. Some evergreen species (Scots pine, holly) will be included for year-round screening. The planting along the north-western boundary will have regard for the presence of the overhead electricity transmission line and will comprise relatively lower-growing species. National Grid clearance requirements will be adhered to;
 - Existing hedging and tree planting that is retained on the perimeter of the site will be protected against damage during construction where possible and augmented with native hedgerow tree and shrub species;
 - Verges within the development will be seeded with low maintenance grass mixes, to create a neat mown edge to roads and footpaths;
 - Swales created within the site will be seeded with an appropriate wildflower / marginal species mix to increase biodiversity and enhance visual amenity;

- Screen planting (existing and as proposed) along the A1290 road frontage will be maintained;
- Feature tree and shrub planting will be used at the entrance to accentuate the sense of arrival and highlight the access point;
- Street furniture, lighting and signage will be co-ordinated across the development as a whole to create a unified style;
- Links will be provided for pedestrians and cyclists into the development area.
- To minimise light intrusion and reduce the prominence of the development at night, from surrounding areas, external lighting within the development will be fully cowled or else directed downwards / inwards, away from the perimeter of the site.

3.25 The landscaping scheme has been designed to provide a range of new ecological habitats to provide a biodiversity net gain, with the focus being on the planting of native species. An ornamental shrub mix closer to the buildings will provide further habitat for wildlife, as well as year-round visual amenity for the development. The areas of grassland proposed comprise wildflower meadow (Emorsgate EM1 mix), flood meadow (Emorsgate EM8 mix), and shade-tolerant wildflower mix (Emorsgate EH1), whilst the areas closer to the building will be a more closely mown lawn.

3.26 The maximum amount of landscaping has been provided, given the site constraints and size of the building and car parking area. Whether the car parking area could be softened by the inclusion of planting has been investigated; however, unfortunately there is not space for any landscaping.

3.27 To help mitigate against noise pollution, a 1m high acoustic barrier will be located on the inside of the perimeter landscaping belt along the north western boundary. The fence will be screened as vegetation grows.

Drainage

3.28 The surface drainage approach for the proposed development relies upon underground storage tanks. The parking areas will use permeable paving with a porous sub-base and a network of collector drains in the sub-base to transfer the water percolating through the fill into the drain network that conveys the water to the storage block. Access roads will be drained by filter drains at the road's edges where layout permits or by gullies or kerb-drains where necessary. The combined flows will pass through a bypass oil separator prior to the storage. A similar arrangement will apply for the site entrance but on a smaller scale.

Hazardous Substances

Control of Major Accident Hazards (COMAH) Statement

3.29 Envision AESC is proposing to build a large-scale battery manufacturing facility and is reviewing the proposed factory's COMAH status within the Control of Major Accident Hazards Regulations 2015.

3.30 Due to the large volume of a Schedule 1 Part 1 material being processed as key component of the manufactured batteries it is expected, but still to be confirmed, that this site will be classed as an Upper Tier COMAH site. This means that a pre-construction and pre-operation safety report will have to be submitted prior to each stage and maintained throughout the lifetime of the plant.

- 3.31 These are extensive documents that review the safety of the proposed site that require in depth analysis of the site hazards.
- 3.32 As part of the preparation of the reports the following is currently planned:
- Review of design decisions and justification;
 - Review of design standards for processing equipment;
 - MAHAZID;
 - Preparation of a MAPP document; and
 - Environmental Risk Tolerability Assessment (CDOIF Assessment).
- 3.33 In addition to the above task, a selection of following (not extensive) list may be used to understand the risks and how to mitigate them:
- DSEAR Review;
 - HAZIDs and HAZOPs;
 - Layer of Protection Analysis (LOPA);
 - Major Hazard Consequence Modelling; and
 - QRA and analysis.
- 3.34 Envision AESC is aware of its responsibilities and will ensure that that the plant will use Best Available Techniques (BAT) and As Low as Reasonably Practical (ALARP) principle to ensure the safety of the site. The use of BAT and ALARP will be demonstrated through the safety report for the factory and will be maintained throughout the plant's operational lifetime.
- 3.35 Given that the scale and nature of the processes to be operated in the battery factory have no direct current comparator in the UK, Envision AESC is currently holding discussions with the Health and Safety Executive to agree the correct interpretation of the COMAH Regulations to the factory.
- Environmental Permitting Regulations**
- 3.36 The large-scale use of solvents in the manufacturing processes to be operated in the proposed battery factory will result in the Envision AESC development being subject to regulation under the Environmental Permitting (EP) Regulations (2016, as amended). A permit will be required under these regulations before the factory can commence operation.
- 3.37 The factory will be regulated as a Part A activity under the regulations, which means that the full range of impacts that the factory may have on the environment will need to be considered before the permit can be issued, including:
- Air quality impact;
 - Water quality impact;
 - Global warming potential;
 - Waste production;
 - Resource efficiency;
 - Accident risk; and
 - Noise and vibration impact.
- 3.38 Envision AESC is aware of its responsibilities and will ensure that that the plant will use Best Available Techniques (BAT) to minimise the factory's environmental impact in each of these

areas. The use of BAT will be demonstrated as part of the permit application for the factory and will be maintained throughout the plant's operational lifetime.

3.39 Given that the scale and nature of the processes to be operated in the battery factory have no direct current comparator in the UK, Envision AESC is currently holding discussions with the Environment Agency to agree the correct interpretation of the EP Regulations for the factory. The discussions will affect who the responsible regulatory authority will be for the factory under the EP Regulations (either the Environment Agency or the Local Authority) but the requirement to implement BAT processes and management techniques will not be affected.

3.40 Overall, the use and storage of any hazardous substances will be controlled through the environmental permitting regulations, which is a separate consenting regime and is separate from the planning process.

Planning Application for the Demolition of West Moor Farm

3.41 A planning application is currently pending consideration for the demolition of the buildings at West Moor Farm, which lies within the application site (application reference 21/01330/FUL). The demolition of these buildings does not form part of the application for the proposed battery plant.

3.42 Subject to planning permission and a Natural England licence being granted, it is anticipated that the buildings will be demolished in late 2021. As such these buildings should have been demolished prior to the start of any construction work associated with the proposed battery plant. However, their demolition has been considered in this submission.

4.0 Planning Policy Context

4.1 This Chapter sets out the relevant planning policy against which the proposed development has been designed and against which it must be determined.

4.2 This Chapter is structured under the following headings:

- National Planning Policy Framework;
- Adopted Development Plan;
- Emerging Development Plan; and
- Other Material Considerations.

National Planning Policy Framework

Achieving Sustainable Development

4.3 Paragraph 7 of the NPPF (revised on 20 July 2021) confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, broadly defined as *“development that meets the needs of the present without compromising the ability of future generations to meet their own needs”*. Paragraph 8 sets out the following three interdependent dimensions of sustainable development which are to be pursued in mutually supportive ways:

- **An economic objective** - to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **A social objective** - to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **An environmental objective** - to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.4 The NPPF confirms that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 11 notes that development proposals that accord with an up to date plan should be approved without delay, or that where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole, or where the application of policies within the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.

Building a Strong, Competitive Economy

4.5 Paragraph 81 states:

*"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight should be placed on the need to support economic growth and productivity**, taking into account both local business needs and wider opportunities for development". (Lichfields emphasis)*

Promoting Healthy Communities

- 4.6 The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Paragraph 91 advises that decisions should aim to achieve places which promote:
- safe and accessible environments for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public spaces, which encourage the active and continual use of public areas; and
 - enable and support healthy lifestyles, including safe and accessible green infrastructure and layouts that encourage walking and cycling.

Promoting Sustainable Transport

- 4.7 The NPPF advises that when considering applications, it should be ensured that:
- appropriate opportunities for sustainable transport modes can be, or have been, taken up given the type of development and its location;
 - safe and suitable access to the site can be achieved for all users;
 - the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree. (para. 110)
- 4.8 Paragraph 111 advises that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.9 All developments that will generate significant amounts of movement should provide a Travel Plan, and the application be supported by a Transport Statement or Transport Assessment so that the impacts can be assessed (para. 113).

Achieving Well-Designed Places

- 4.10 The NPPF advises that *"the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve"* (para. 126). Good design is therefore considered a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.11 Paragraph 130 further confirms that planning decisions should ensure that developments:
- Will function well and add to the overall quality of the area, not just for the short term but over the life lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.12 Paragraph 131 recognises that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Opportunities should be taken to incorporate trees in developments.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

4.13 Paragraph 152 affirms that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.

Conserving and Enhancing the Natural Environment

4.14 The NPPF advises at paragraph 174 that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

4.15 Paragraph 174 further stipulates that planning decisions should protect and enhance valued landscapes and prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Conserving and Enhancing the Historic Environment

4.16 Paragraph 194 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting.

4.17 In determining applications, Paragraph 197 sets out that Local Planning Authorities should take account of various criteria including the desirability of sustaining and enhancing the significance of heritage assets; and the desirability of new development making a positive contribution to local character and distinctiveness.

Implementation

4.18 Paragraph 219 states that due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. The closer the policies to the NPPF, the greater the weight to be given.

Adopted Development Plan

- 4.19 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be in accordance with the Development Plan unless material considerations indicate otherwise. Accordingly, the adopted development plan relevant to the application site comprises the following:
- International Advanced Manufacturing Park Area Action Plan (adopted 30 November 2017);
 - Sunderland Core Strategy and Development Plan 2015-2033 (adopted January 2020); and
 - Sunderland Unitary Development Plan (adopted September 1998).

International Advanced Manufacturing Park Area Action Plan

- 4.20 The International Advanced Manufacturing Park Area Action Plan ('AAP') provides the planning policy framework for the comprehensive development of approximately 392,000 sqm of floorspace for uses relating to the Automotive and Advanced Manufacturing sectors. This is to be delivered on 150 hectares of land, with 110 hectares of adjacent land safeguarded for ecological and landscape mitigation. The AAP was jointly adopted by both the Council and South Tyneside Council on 30 November 2017.

- 4.21 The AAP's vision for the IAMP is:

"A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries. A planned and sustainable employment location that maximises links with Nissan and other high value automotive industries as well as the local infrastructure assets, including the ports, airports and road infrastructure." (para. 2.6)

- 4.22 The AAP states that the type of place which the Council want to create is:

"an attractive working environment that creates the conditions in which businesses can establish and thrive and where people choose to work. A unique opportunity for increased job and business creation and the promotion of regional prosperity whilst taking advantage of natural assets and green infrastructure including the River Don corridor." (para. 27)

- 4.23 The following AAP Policies are considered relevant to the development proposals:

- **Policy S1: Spatial Strategy for Comprehensive Development** – sets out the strategy for the comprehensive development of the IAMP for the principal uses associated with the automotive and advanced manufacturing businesses and states that this will be delivered by:
 - 1 *"Revising the Green Belt boundary to release 150ha of land from the Green Belt.*
 - 2 *Allocating approximately 150ha of land for the development of principal uses (as defined in Policy S2) in the Employment Areas.*
 - 3 *Designating approximately 110ha of land as an Ecological and Landscape Mitigation Area to provide for mitigation and/or compensation of the ecological and landscape impacts of the IAMP development.*
 - 4 *Requiring Masterplans, Design Codes and Phasing Plans to be submitted which demonstrate how development:*
 - i *will meet the objectives of the AAP and will not prejudice comprehensive development of the IAMP;*

- ii *ensures the proposed development is designed and orientated to relate well to the existing employment area and Enterprise Zone and established infrastructure;*
- iii *contributes fully to the delivery of the IAMP as a project of national significance;*
- iv *contributes fully, in a proportionate and timely manner, towards providing the infrastructure identified in the IDP;*
- v *contributes fully, in a proportionate and timely manner, to providing for the mitigation required for the IAMP, including environmental mitigation; and*
- vi *is capable of being implemented without breaching the provisions of the Planning Act 2008.”*

- **Policy S2: Land Uses** supports the IAMP AAP objectives to build on the area’s international reputation in the automotive industry; support Nissan; and attract European-scale ‘super-suppliers’ linked to the automotive industry. This policy states:
 - b Development of the Employment Areas must be for the Principal Uses of production, supply chain and distribution activities directly related to the Automotive and Advanced Manufacturing sectors, as defined in paragraphs 86-87, and related Supporting Uses; and
 - c To ensure premises are retained for their original permitted use in the long term, the DCO must contain requirements to that effect, or otherwise the Councils may consider making a direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 to that effect.
- **Policy S3: Scale and Quantum of Principal and Supporting Employment Uses** – states that consent will be granted for up to 392,000sqm of space consisting of:
 - i 356,000sqm of employment space for the Principal B1(c), B2 and B8 classes; and
 - ii up to 36,000sqm of employment space for Supporting B1(a) and B1(b) class uses, only where this is related to the Principal Uses defined in Policy S2.

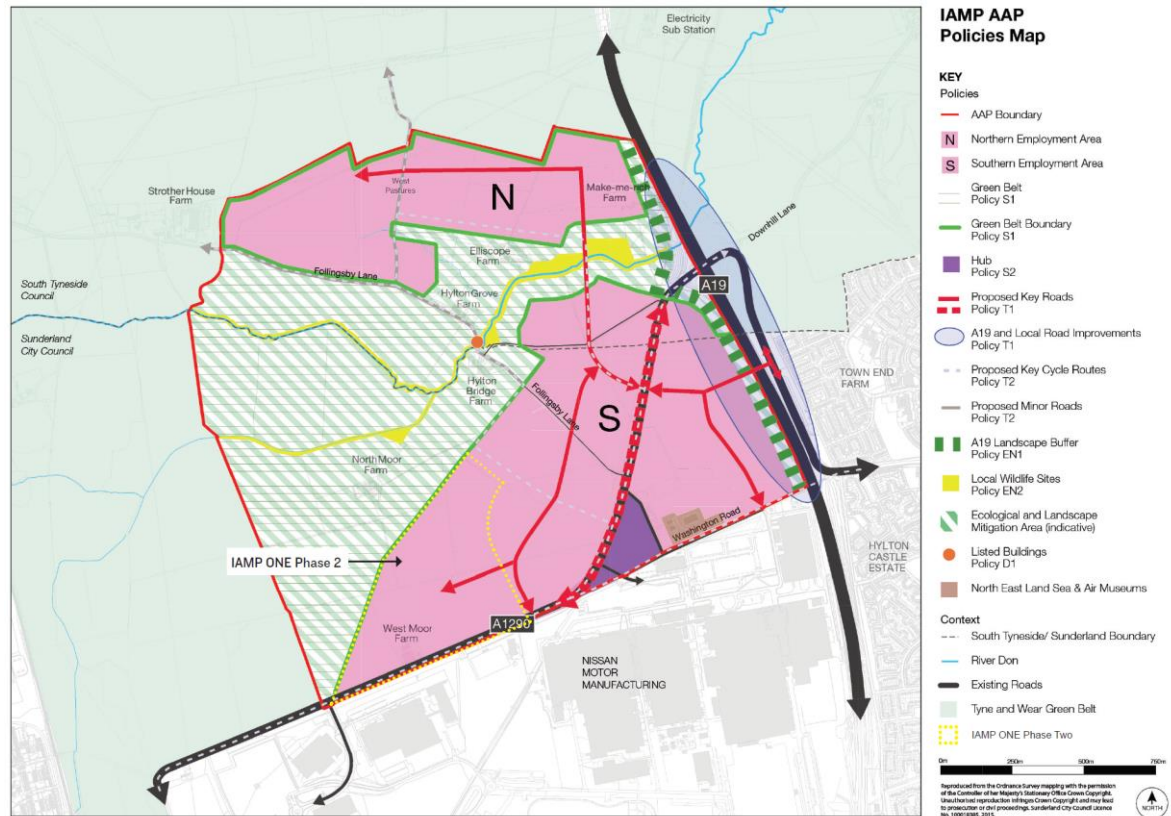
4.24 The other AAP policies considered relevant to the development proposals are summarised as follows:

- Policy D1 (Masterplan Design);
- Policy D2 (Public Realm);
- Policy T1 (Highway Infrastructure);
- Policy T2 (Walking, Cycling and Horse Riding);
- Policy T3 (Public Transport);
- Policy T4 (Parking);
- Policy IN1 (Infrastructure Provision);
- Policy IN2 (Flood Risk and Drainage);
- Policy EN1 (Landscape);
- Policy EN2 (Ecology);
- Policy EN3 (Green Infrastructure);
- Policy EN4 (Amenity);
- Policy Del1 (Phasing and Implementation); and
- Policy Del2 (Securing Mitigation).

4.25 A summary these policies is provided in Appendix 1.

4.26 Figure 4.1 shows the IAMP AAP Policies Map, which allocates the application site as part of the Southern Employment Area.

Figure 4.1 Extract from the IAMP AAP Policies Map with the Location of IAMP ONE Phase 2 Identified, Where the Battery Plant will be Located



Source: IAMP AAP

Sunderland Core Strategy and Development Plan 2015-2033

4.27 The Sunderland Core Strategy and Development Plan 2015-2033 ('CSDP') sets out the Council's long-term plan for development across Sunderland up to 2033. It seeks to ensure that the right type of development is focused in the right places to meet the needs of local people and businesses. The CSDP was adopted by the Council in January 2020.

4.28 Through the implementation of the CSDP policies, the Council seeks to guide investment and development to deliver the plan's overarching spatial vision which includes the following objectives:

By 2033, Sunderland will be a place that is:

- open to business and is responsive to the changing needs and demands of their growing economy;
- is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and
- which creates new and diverse job opportunities particularly in advanced manufacturing.

4.29 To assist the delivery of the spatial vision, various strategic priorities are provided which include:

- **Strategic Priority 1 (Spatial Strategy):**

“To deliver sustainable economic growth and to meet objectively assessed needs for employment and housing, in particular through providing opportunities for young economically active age groups and graduates.”

- **Strategic Priority 5 (Economic Growth):**

“To provide a wide portfolio of employment sites to support the development of key employment sectors and expand the opportunities for new office development.”

4.30 Paragraph 2.55 of the CSDP state:

“Advanced manufacturing and particularly the automotive sector are a key part of the local economy, centred around the Nissan plant, which is producing more than 500,000 vehicles a year, and a thriving supply chain extending along the A19, A1 corridors. The sector employs 30,000 people regionally. To support the continued growth of this sector, the IAMP will be delivered on land to the north of the existing Nissan plant. It is anticipated that the IAMP would create approximately 7,850 new jobs and would be a significant driver for the regional economy and the automotive sector within the UK.”

4.31 The following CSDP Policies are considered relevant to the development proposals:

- **Strategic Policy SP3 (Washington)** states that: *“Washington will continue to thrive as a sustainable mixed community and a drive of economic growth for Sunderland. In order to achieve this, economic growth will be focused in identified Employment Areas (Policies EG1 and EG2) and at the IAMP.”* The supporting text states that the IAMP AAP will drive the comprehensive development of the IAMP (para. 4.43).
- **Strategic Policy SP10 (Connectivity and Transport Network)** promotes the delivery of various new highway schemes and initiative including key junctions on the A19, including providing access to the IAMP. The supporting text to this policy states that:

“The IAMP AAP Infrastructure Delivery Plan contains the road improvement works that are required to specifically support the IAMP”. (para. 12.6)

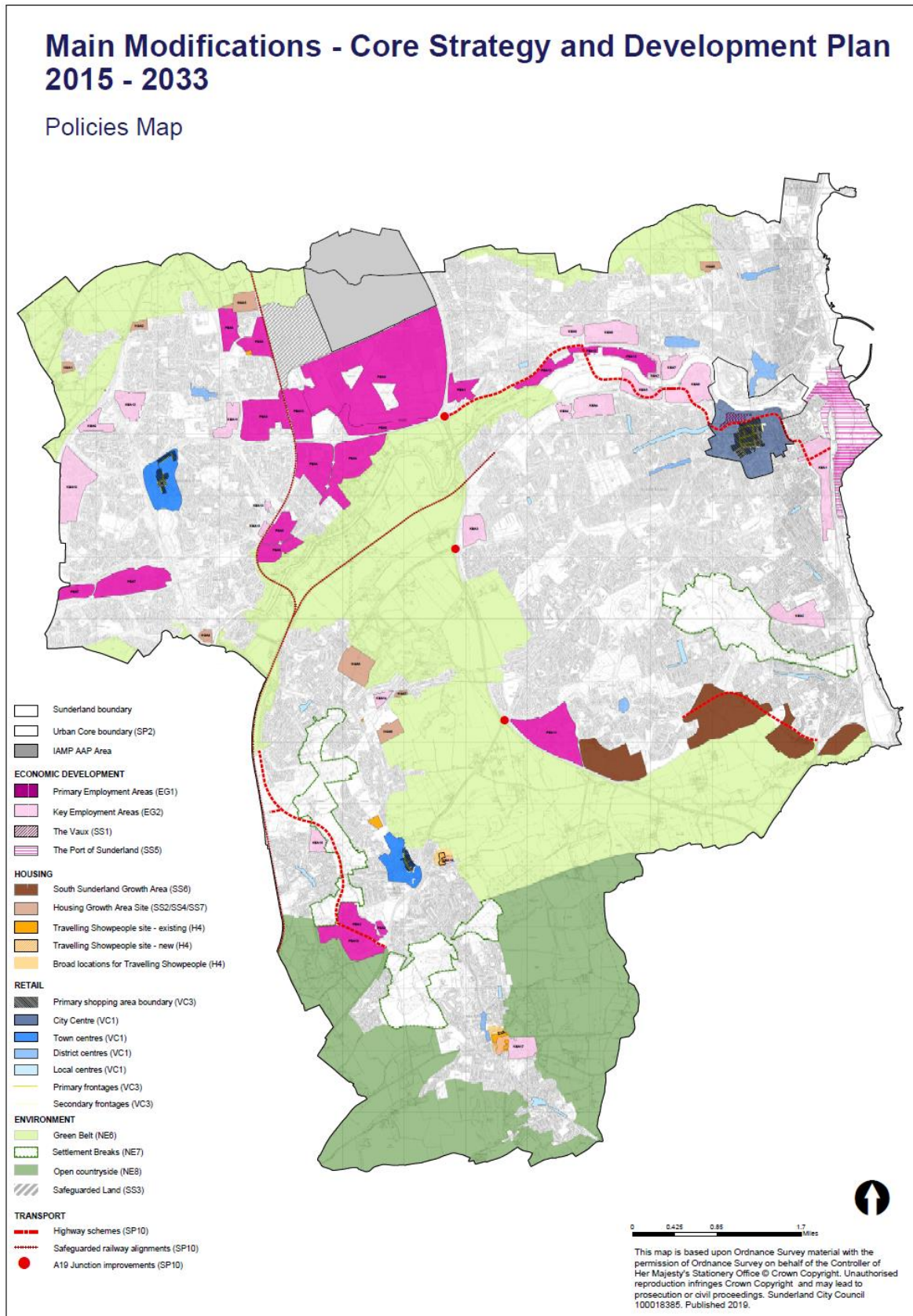
4.32 The following additional CSDP policies are also considered relevant to the consideration of the proposed development:

- Strategic Policy SP1 (Development strategy);
- Strategic Policy SP7 (Health and wellbeing);
- Policy HS1 (Quality of life and amenity);
- Policy HS2 (Noise-sensitive development);
- Policy HS3 (Contaminated land);
- Policy HS4 (Health and safety executive areas and hazardous substances);
- Policy BH1 (Design quality);
- BH2 (Sustainable design and construction);
- BH3 (Public realm);
- Policy BH7 (Historic Environment);
- Policy BH8 (Heritage Assets);
- Policy BH9 (Archaeology and recording of heritage assets);
- Policy NE1 (Green and blue infrastructure);

- Policy NE2 (Biodiversity and geodiversity);
- Policy EN3 (Woodlands / hedgerows and trees);
- Policy NE9 (Landscape Character);
- Policy NE11 (Creating and Protecting Views);
- Policy NE12 (Agricultural Land);
- Policy WWE2 (Flood risk and coastal management);
- Policy WWE3 (Water management);
- Policy WWE4 (Water quality);
- Policy WWE5 (Disposal of foul water);
- Policy WWE6 (Waste management);
- Policy ST2 (Local road network);
- Policy ST3 (Development and transport); and
- Policy ID1 (Delivering infrastructure).

4.33 A summary of these policies is provided in Appendix 1, whilst an extract from the CSDP Policies Map is provided in Figure 5.2 which highlights the IAMP AAP area in grey to the north.

Figure 5.2: CSDP Policies Map with the IAMP AAP Area highlight in grey



Source: Sunderland City Council

Sunderland Unitary Development Plan

4.34 The Sunderland Unitary Development Plan ('UDP') was adopted by the Council in September 1998. Following the adoption of the CSDP in January 2020, a number of UDP Policies were retained and are therefore to be considered alongside policies contained within the CSDP.

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

4.36 Paragraph 4.26 of the UDP states the following about Nissan:

"The story of Nissan's location in Sunderland is one of continuing expansion and growth. There has also been a significant multiplier effect with almost 3,000 people employed by Nissan suppliers within the City area, as well as the 4,000 or so who are directly employed. Following Nissan's decision to locate in the North East in 1984, some 28 Japanese companies have chosen to settle here, forming the largest concentration of Japanese engineering investment in Europe. Despite market fluctuations, sales of Nissan cars in Western Europe are expected to increase. Nissan is now one of the UK's largest car manufacturers with a substantial proportion of production going for export. It claims to contribute some £500million annually to the Region's economy.

*The company operates a lean production system keeping stocks to a minimum, requiring regular and frequent deliveries of parts, meaning that suppliers often need to be physically close to their customer. Some, such as Ikeda Hoover, are literally at the factory gate. This track record of rapid development and expansion is exceptional and the Council recognises the important role which the Nissan company plays in the economy. **An extension into other land north of the A1290 by Nissan itself or for an associated business which needs to be located close to the Nissan complex may be considered.** Because of the area's Green Belt status, any proposal will have to demonstrate exceptional need and include appropriate nature conservation measures."*

4.37 A Wildlife Corridor, as designated under saved Policy CN23, is located within the ELMA, beyond the site's northern / western boundaries. Policy CN23 advises that within the wildlife corridor (i) measures to conserve and improve the environment will be encouraged, (ii) development which would adversely affect the continuity of corridor will normally be refused and (iii) where, on balance, development is acceptable because of wider plan objectives, appropriate habitat creation measures will be required to minimise its detrimental impact'.

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

- Policy L10 (Countryside Recreation) – Improve and promote countryside recreational activities including (i) improving and extending the network of footpaths, bridleways and cycleways;
- Policy T10 (Paths and Multi-User Routes) advises that consideration will be given to the feasibility of adapting some of these routes for use by cyclists, people with disability and horse riders to provide multi-user routes;
- Policy T11 (People with Disabilities and Other Special Needs) – particular attention to be given to the needs of persons with mobility problems and sensory impairments; and
- Policy B14 (Built Environment – Archaeological Assessment) – archaeological assessments are required where a development will affect sites of known or potential archaeological

importance and where major developments involve large scale ground disturbance in currently undeveloped areas.

Emerging Development Plan

Draft Allocations and Designations Plan

4.39 The Draft Allocations and Designations Plan ('ADP') sets out local policies including site-specific policy designations and allocations for the development, protection and conservation of land in the City in order to deliver the overall strategy as set out within the CSDP. The Council consulted on the ADP between 18 December 2020 and 12 February 2021 and representations are currently being taken into consideration.

4.40 Although the ADP is yet to be formally adopted by the Council, local planning authorities may give weight to relevant policies in emerging plans in accordance with paragraph 48 of the NPPF. As such, the ADP is considered to hold relative weight to the proposed development and has therefore been taken into account in the preparation of this planning application.

4.41 Paragraph 3.7 of the ADP sets out the following:

"North East Washington is an area of the city with significant amount of development potential. IAMP located to the East of North East Washington is the premier location for advanced manufacturing and automotive technology."

4.42 Paragraph 3.8 further states:

"It is anticipated that Washington Meadows and IAMP will be a catalyst for the regeneration of the wider North East Washington Area."

4.43 As such, the ADP actively seeks to focus regeneration and new development within North East Washington, with a specific emphasis of delivering advanced manufacturing and automotive technology within the IAMP.

4.44 The following emerging ADP Policies are considered relevant to the development proposals:

- Policy SP12 (Allocations and Designations Development Strategy);
- Policy BH11 (Scheduled Ancient Monuments);
- Policy NE13 (Regionally and Locally Protected Wildlife and Geodiversity Sites);
- Policy NE15 (Greenspace); and
- Policy NE16 (Views of the city).

Other Material Considerations

The North East Strategic Economic Plan

4.45 The North East Local Enterprise Partnership ('NELEP') published a revised version of The North East Strategic Economic Plan ('SEP') in January 2019. The SEP is recognised as the North East's plan for **growing and developing a more productive, inclusive and sustainable regional economy**. Its ambition is to **increase the number of jobs in the North East by 100,000 between 2014 and 2024**, with 70% of these being better jobs, defined as managerial, professional and technical roles.

4.46 In delivering this ambition, the SEP identifies four areas within the North East economy where assets and capabilities have enabled a strong opportunity for growth. These areas include Digital, Advanced Manufacturing, Health and Life Sciences and Energy.

4.47 Having particular regard to Advanced Manufacturing, the SEP identifies the IAMP as a major and nationally significant employment site. The plan highlights the broader site as part of the North East Enterprise Zone, stating the following:

*“Enterprise Zones are crucial to the **growth of the advanced manufacturing sector** and we will continue to work hard to attract business and investment, with **particular focus on the IAMP**. A £500 million development, IAMP is strategically located near Nissan to **house major international supply chain companies** and create over **5,000 jobs by 2024**.”*

City Deal

4.48 The City Deal was signed between the Council, South Tyneside Council and the Government in 2014. The City Deal has five key aims:

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

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

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

4.51 Sunderland Transforming our City: The 3.6.9 Vision

4.52 This vision sets out that by 2024, Sunderland will deliver:

- Over £1bn of investment into the city’s infrastructure and industrial assets;
- Approximately 20,000 new jobs created across a range of sectors, increasing the city’s productivity and reducing unemployment levels;
- A more vibrant and attractive city with more happening in terms of events, entertainment and culture; and
- A significant increase in our levels of education and skills.

4.53 With respect to the IAMP, the document states:

*“We see the **most important sectors for job creation in the city being the Manufacturing and Automotive sector** where we anticipate more than 5,000 new jobs as a result of continued organic growth in the sector and the **stimulus given by the establishment of the International Advanced Manufacturing Park** and the associated Enterprise Zone.”*

*“The IAMP will bring a predicted **£295 million in private sector investment** and the creation of **over 5,200 new jobs over the next decade with more than 500 new jobs being created every year from 2018**.”*

Northern Powerhouse

- 4.54 The Northern Powerhouse is a proposal to boost economic growth in the North of England, bringing together cities, towns and rural communities of the North to become a powerhouse for economic growth. This is to be achieved through modern transport links, a revolutionary new style of governance and increased investment.
- 4.55 The Northern Powerhouse strategy which underpins this ambition seeks to ensure the Northern Powerhouse is recognised worldwide for the trade and investment opportunities it offers, supported by over half a billion pounds of investment to improve transport links, unlock housing and to enhance digital connectivity. However, key barriers to driving productivity growth are identified as: lower levels of foreign direct investment (FDI) projects per head, lower proportions of graduates and poor connectivity.
- 4.56 In order to address this, the strategy seeks to support 17 Enterprise Zones across the North by 2017, including the IAMP. It also recognises that the **North has significant strengths in a number of sectors which will be built upon to drive growth, including manufacturing; with 42% of the UK's total car production manufactured in the Northern Powerhouse in 2015.**

Northern Powerhouse Independent Economic Review

- 4.57 The Northern Powerhouse Independent Economic Review ('NPIER') was commissioned by the Transport for the North ('TfN') partners, collaborating with the wider Northern Powerhouse partnership. The findings of the Review characterise the North's economic position and the drivers underpinning its performance, and identify opportunities where pan-Northern drivers and collaboration can support local activities.
- 4.58 In particular, the Review identifies the North as having four prime capabilities which are highly productive and can compete on the national and international stage, comprising of: the advanced manufacturing, energy, health innovation and digital sectors.
- 4.59 However, in order to support further growth, the conclusions of the Review set out the need to support investment and improved performance in a number of critical areas in order to support further growth, including:
- Improved education outcomes and work-based and vocational training;
 - Improved graduate retention and attraction, helped by better prospects for skilled, mobile workers to make their careers in the North through good access to opportunities in more than one town/city, and by a good supply of high-quality housing;
 - Better commercialisation of university research to the benefit of the North's business base;
 - Better management skills, including the uptake of innovation; and
 - **Attraction of inward investment by world-leading, international businesses** that can bring transformed business practices and access to leading technologies.
- 4.60 Overall, the Review identifies that by 2050, a 'transformed North' which incorporates these measures could create **850,000 more jobs** and **£97 billion more in GVA** than if there was 'business as usual'.

Great North Plan

- 4.61 The Institute for Public Policy Research ('IPPR') North and the Royal Town Planning Institute ('RTPI') have set out a blueprint for a 'Great North Plan' to support the development of the

powerhouse and to provide a joined up approach to economic planning. It is proposed that this should include:

- an overall vision or the North up to 2050; northern transport, economic, natural assets and people and place strategies; and a prospectus for the North to encourage national and international investors. It is considered that this approach will present a unique opportunity to put forward a dynamic and timely representation of the North and its 'offer', helping to **attract investment** that will help the North to achieve its geographical and social vision.

Transport for the North's Strategic Transport Plan

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

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

- **Improving competitiveness**, rebalancing growth and allowing economic assets to thrive, addressing the long-term economic activity gap;
- Providing employers and businesses with **better access to a highly skilled and talented labour market, with improved links to the supply chain**, more diverse and cost-effective business opportunities and a more buoyant marketplace;
- Enabling freight and logistics operators to meet ever increasing demands for smart logistics activities and drive down operating costs, helping to attract additional investment as companies cluster in more accessible locations;
- Generating a greater return on investment from public expenditure through **higher productivity and increased economic participation**; and
- Providing **access to more work and leisure opportunities**, enhancing the quality of life, and improving living standards and the communities of the North.

The UK's Industrial Strategy

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

4.65 Key policies include (*inter alia*):

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

4.66 The overall vision is to create:

- The world's most innovative economy;

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

Summary

- 4.67 The NPPF states that the planning system should proactively drive and support sustainable economic development, including delivering the businesses, industrial units and infrastructure that the country needs.
- 4.68 The application site forms part of the wider IAMP area which is allocated for approximately 392,000sqm of floorspace for uses relating to the Automotive and Advanced Manufacturing sectors in the adopted AAP. Wider policy objectives include the need to deliver additional employment opportunities in order to support the growth of the Northern Powerhouse; retain skilled workers; capitalise on the region's strengths in key sectors such as manufacturing, transport and logistics; and supporting inward investment in highly accessible locations close to key transport networks.
- 4.69 National and local planning policy set out a range of policies that relate to design, environmental and technical issues which need to be taken into account in the determination of planning applications. These are considered in the following chapters of this Planning Statement.

5.0 Planning Assessment

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 This Chapter therefore assesses the conformity of the proposals against the adopted development plan and other planning policy requirements as identified in Chapter 4. The following technical considerations are included in the assessment:
- Principle of Development;
 - Economic Benefits;
 - Design;
 - Transport and Accessibility;
 - Flood Risk and Drainage;
 - Ecology, Landscape and Trees;
 - Landscape and Visual Assessment;
 - Cultural Heritage and Archaeology;
 - Air Quality;
 - Noise and Vibration;
 - Amenity;
 - Health;
 - Climate Change;
 - Energy and Sustainability;
 - Geology, Ground Conditions and Soils;
 - Loss of Agricultural Land; and
 - Waste.

Principle of Development

- 5.3 The proposals are for a battery plant which would be operated by Envision AESC UK Ltd, the application, with ancillary office / welfare accommodation. The battery modules would be used primarily in electric cars. The total floorspace is 108,615sqm (GIA), of which 3,750sqm is ancillary office accommodation.
- 5.4 Paragraph 10 of the IAMP AAP advises that: *“The development of the IAMP will underpin the continued success of the automotive and advanced manufacturing sectors in the UK and the North East of England”*. The vision for the IAMP is, as provided in paragraph 26 of the AAP is:
- “A nationally important and internationally respected location for advanced manufacturing and European-scale supply chain industries. A planned and sustainable employment location that maximises links with Nissan and other high value automotive industries as well as the local infrastructure assets, including the ports, airports and road infrastructure.”*
- 5.5 This is a unique and most exciting opportunity to help Sunderland and the UK become one of the best international locations for automotive and advanced manufacturing. The proposals will confirm Sunderland as the heart of automotive electrification activities in the UK, building on

both Nissan's and Envision AESC's initial investments in LEAF and the current battery plant. The proposals will help ensure that Envision, the IAMP and Sunderland are at the forefront of innovations in battery technology and are playing a critical role in leading the de-carbonisation revolution through the promotion of clean energy and new energy electric vehicles.

Uses

- 5.6 The site is allocated for Principal and Supporting uses associated with the automotive and advanced manufacturing sectors under the IAMP AAP Policies S1, S2 and S3. Policy S3 allocates up to 392,00 sqm of land at IAMP as follows:
- 1 up to 356,000sqm of employment floorspace for the Principal uses, which are defined as light industrial, general industrial and storage & distribution uses; and
 - 2 up to 36,000sqm of employment floorspace for the Supporting uses, which are defined as office and research & development uses.
- 5.7 The proposed battery plant would be a general industrial use (Use Class B2) that would be directly related to the automotive sectors and, as such, the proposed use accords with the Principal Uses permitted through Policy S3. Additionally, the ancillary office and welfare accommodation would also be consistent with the permitted Supporting Uses defined under this policy.
- 5.8 A total of 52,967.80 sqm (gross internal area) of principal uses and 4,935 sqm (gross internal area) have been granted permission at IAMP. The proposed 105,225sqm of general industrial uses and 3,750sqm of ancillary office accommodation (GIA) fall well within the maximum floorspaces permitted under Policy S3 for development across IAMP as a whole.

Amount of Floorspace

- 5.9 Detailed / reserved matters permission has been granted for three units (Plots 3, 4 and 5/6), with their floorspace totalling 57,902.80sqm (623,261sqft). Table 5.1 below shows this calculation.

Table 5.1 Detailed Approved Floorspace at IAMP

Plot	Floorspace (Gross Internal Area)
Plot 3	21,856sqm
Plot 4	24,576sqm
Plot 5/6	11,470.80sqm
Total	57,902.80sqm

- 5.10 The remaining floorspace is 98,937.2sqm (1,064,951sqft). Table 5.2 shows this calculation.

Table 5.2 Remaining Floorspace at IAMP ONE

	Floorspace (Gross Internal Area)
Total Approved IAMP One Floorspace	156,840sqm
Amount approved / under construction	57,902.80sqm
Amount Remaining	98,937.20sqm

- 5.11 As this detailed planning permission is for 108,615 sqm (GIA) of floorspace, this total exceeds the remaining amount of approved floorspace within IAMP ONE by 9,677.8sqm. The key reason for the floorspace cap as part of the previous planning applications was to prevent a harmful impact on the strategic highway network in advance of the A19 / A1290 Downhill Lane junction improvements taking place.

- 5.12 However, as explained in the Access and Transport Chapter of the Environmental Statement (ES), the traffic generation forecasts for IAMP ONE were informed by surveys at Unipres, an operation associated with, and supplier to, Nissan. This method was endorsed by Highways England and the Local Highway Authority.
- 5.13 Using known staffing levels at Unipres and previously estimated gross external floor area (GEA) for the Unipres building, it is possible to derive a GEA factor area factor to establish the number of staff inherently assumed within the previous trip generation and capacity assessments.
- 5.14 Envision can accurately forecast their anticipated staff numbers based on known operational requirements of the battery plant and expect that up to 1,000 staff would be employed. Tables 5.3 and 5.4 provide a direct comparison between Unipres and Envision staff levels when compared to floorspace.

Table 5.3 Staff Levels Comparison

	Unipres	
Gross Floor Area	55,000sqm (GEA approx.)	108,615sqm (GIA)
Office Day Shift Staff	150	150
Production Staff	1,050	850
Workforce Total	1,200	1,000 (inc 300 to be transferred)
Staff per Production Shift	350	Approx. 220
Approx. Staff per 100sqm	2.18	0.92

- 5.15 It is therefore clear that due to the highly automated processes to be deployed within the battery plant, with some areas not being accessible to staff and only being used solely for housing plant, staff numbers are relatively low compared to the floor area.
- 5.16 By comparison, on a pro-rata basis, based on known Unipres staff numbers and estimated GEA, the proposed battery plant would be assumed to yield a workforce total of 2,374 staff. The higher rate of staff per 100m² is this level that was previously ingrained in the trip generation assumptions and assessed within the IAMP ONE and IAMP ONE Phase Two Transport Assessment / Statement.
- 5.17 As such, even though the floorspace will be higher, the number of vehicle movements will be less, and hence the impact on the highway network will be less than that previously assessed and approved.
- 5.18 The mechanism for ensuring that no further development within IAMP ONE coming forward until the Downhill Lane junction improvement works have been completed is to be agreed during the determination process.

Comprehensive Approach to Development at IAMP

- 5.19 The proposed layout excludes the land reserved for the proposed future dualling of the A1290. This ensures that this land is safeguarded, that the scheme contributes towards the comprehensive development of IAMP and would not prejudice the delivery of future infrastructure, in accordance with criterion A(i) of IAMP AAP Policy T1 (Highway Infrastructure).

Economic Benefits

Benefits of IAMP

- 5.20 The NPPF advises, at paragraph 81, that decisions should help create the conditions in which businesses can invest, expand and adapt. This paragraph continues by stating that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”.
- 5.21 The Area Action Plan for the IAMP outlines that IAMP will become a nationally important and internationally respected location for advanced manufacturing and European scale supply chain industries.
- 5.22 The IAMP will play a vital role in providing suitable land to facilitate the expansion of the existing UK and North East automotive manufacturing hub, leveraging in private sector investment and supporting economic growth. The Sunderland City Deal anticipated that the IAMP could generate 5,200 new jobs and £295m in private sector investment by 2026/27. These figures relate to a 100ha site, however, the size of the IAMP has been increased to 150ha and hence the benefits, including the creation of over 7,600 jobs, will be substantially greater.
- 5.23 It will also underpin the continued success of the automotive and advanced manufacturing sectors in the North East – recognised internationally as an automotive manufacturing locating due to the presence of Nissan. Nissan has been based in the region since 1985 and its presence has led to the expansion of an ‘automotive cluster’. This is centred on the Nissan plant (northwest of Sunderland) with a number of manufacturers linked to the Nissan supply chain located nearby.
- 5.24 Based upon the scale and prestige of the proposed development, it is considered that the IAMP offers the potential to make a considerable contribution to strategic economic objectives at the local (City Deal) and larger than local (Northern Powerhouse) level.
- 5.25 The Northern Powerhouse initiative focuses on addressing the key challenge of rebalancing the wider North East economy and setting it on a new self-sustaining path of economic growth. The IAMP Area Action Plan Commercial and Employment Technical Background Report considers the contribution that could be made by the proposed development of the IAMP to the Northern Powerhouse initiative, stating that:
- “This rebalancing will involve securing the major opportunity presented by manufacturing growth based upon the successful automotive cluster and other advanced manufacturing and cascading the additional wealth generated throughout the wider economy through a revitalised city centre economy based upon central business district growth.”*

Proposed Battery Plant - Important Economic Benefits

- 5.26 The proposed battery plant will provide most important economic benefits which will help drive forward economic growth within Sunderland and the wider region. These are summarised as follows:
- Investment of £450 million in the facility;
 - Capacity to produce up to 9GWh of batteries per year;
 - Capacity to produce batteries for more than 100,000 electric vehicles per year;
 - Generating up to 550 direct FTE jobs at the peak of the construction phase and in turn supporting a further 610 indirect FTE jobs in the supply chain;

- Delivering an uplift in GVA (economic output) of £76.1 million at the peak of the construction phase;
- Creating 1,000 direct jobs at the facility once operational, including the creation of 700 new jobs and the relocation of 300 jobs. This level of employment has the potential to support an uplift in GVA of £64.5 million per annum and will draw on the significant skills and experience of the existing workforce;
- Delivering an uplift in local authority revenue. It is estimated that the scheme could generate approximately £1.5 million in business rates per annum, 50% of which could accrue to Sunderland City Council under current business rates retention arrangements;
- Powered by 100% renewable energy, including a proposal for on-site generation from solar panels;
- Confirms Sunderland as the heart of automotive electrification activities in the UK, building on both Nissan's and Envision AESC's initial investments in LEAF and the current battery plant; and
- Provides opportunities for the materials used in battery produced to be sourced from local suppliers, further enhancing the benefits for the North East and UK economies.

5.27 In accordance with paragraph 81 of the NPPF, it is considered that significant weight should be given to these benefits in decision-taking, given the most important role that they will play in supporting economic growth and productivity both in terms of the local and national economy.

Design

5.28 A Design and Access Statement, prepared by RPS, accompanies the planning application and describes the design process, the site constraints, the need for the building to be designed to reflect manufacturing and operational requirements, the site layout, scale and appearance of the building, the landscaping and boundary treatment details, access provision, as well as personal safety and crime prevention. The building design is also discussed in Chapter 3 of this report.

5.29 The site is semi-rural farmland which forms part of an area of land allocated for advanced manufacturing and automotive uses in the IAMP AAP. Three large scale industrial units have already been constructed within IAMP ONE and the proposed building will be seen in the context of these buildings, and the buildings at Nissan and Unipress to the south. The character of this area is therefore commercial / industrial in nature, both in the context of the new buildings at IAMP ONE and well as the large Nissan plant to the south. This character is further reinforced by the nearby business parks and industrial estates that can be found in the general vicinity known as Follingsby Max, Hillthorne Business Park and Turbine Business Park.

5.30 The scale of the building, which steps up to a maximum of 30m in height, has been defined by the manufacturing processes. 30m is also the maximum height which was approved through the IAMP ONE Phase 2 permission. By comparison the Nissan paint shop is 26m high to accommodate all plant and machinery.

5.31 The proposed development will be designed with robust materials comprising metal-faced cladding on a steel frame. Where appropriate, glazing will be toughened and where possible, all windows and doors will be certified secure products. All curtain walling, ribbon windows, doors and louvers will be finished to contrast and will complement the wall cladding colours. Curtain wall glazing will be used on the entrance zones to add visual interest and prestige. The glazing highlights the entry to the building, reducing the need for unnecessary signage and visual clutter. The same palette of materials and colours are to be applied across the buildings to ensure consistency in design and to visually harmonise the developments within the surrounding industrial areas.

- 5.32 Consideration has been given to the layout of the development to ensure personal safety. This relates not only to ensuring the layout does not create an environment conducive to crime but also to how occupiers and visitors to the site can move freely without risk. Spaces and pedestrian routes are well defined with easily recognisable entrances, providing convenient movement without compromising security. Proposed car parking is also provided in the most prominent locations possible.
- 5.33 Natural surveillance and active frontages form a key factor in the overall design of the proposed development and the positioning of offices overlooking the car parking area offers a high degree of visual control. The building design and layout has also been considered to minimise visual obstacles and eliminated places of concealment. Any potential dark areas will also be well illuminated.
- 5.34 Fences will be introduced around the boundary of the site to provide both a visible and physical deterrent to unwelcome visitors, separating the proposed development from public areas. The fencing will comprise a combination of a 2.4m high paladin fence across more exposed frontages, and a 1.2m timber post and wire mesh fence around more enclosed areas. The development will also have full site coverage via CCTV in a dedicated security office.
- 5.35 Solar PV panels are proposed on the roof of the building and will be the primary means of reducing carbon emissions, along with Air Source Heat Pumps ('ASHPs') in the office areas, improved fabric efficiency and potentially Waste Water Heat Recovery ('WWHR'). Accordingly, the proposed development will be designed with a view of achieving a BREEAM 'Very Good' rating and hence the impacts of the project will be considered from a lifecycle perspective (i.e. from concept stage through to a fully constructed building). This includes driving sustainable building approaches and technologies.
- 5.36 In account of the above, the proposed development will form a natural extension to IAMP, sitting comfortably within its overall context without being detrimental to the character of the surrounding area. Overall, the proposed development accords with Policies D1 (Masterplan Design) and D2 (Public Realm) of the IAMP AAP, as well as Policy BH1 (Design Quality) of the CSDP with regards to maximising opportunities to create sustainable developments of high-quality design. It incorporates green space and ecological mitigation which is considered to compliment the scheme in accordance with AAP Policy NE 2 (Biodiversity and Geodiversity).

Transport and Accessibility

- 5.37 A Transport Statement has been prepared by Systra to accompany the planning application. The statement sets out that the surrounding highway network can accommodate the additional traffic generated by the full build out of IAMP ONE without significant queuing or delay.
- 5.38 The proposed development will employ less staff than previously considered in earlier assessments undertaken for IAMP ONE. As such, there will be less traffic anticipated which will not exceed the thresholds of acceptability previously determined. Therefore, the impact of the proposed development on the road network is not considered to be severe.
- 5.39 An appropriate level of car parking is proposed that will meet operational requirements whilst balancing the need to encourage the use of sustainable modes of transport. The proposed level of car parking spaces is less than those set out in the Council's Development Management SPD; however, the lower provision is justified in the Transport Statement and takes into account the shift changes over times and that not all staff are present on-site at once.
- 5.40 The Transport Statement confirms that the site is accessible to bus services with existing bus stops on the A1290. Bus services 50 and '56 Fab Fifty-Six' are located on the A1290, within 500m of the site, offering a 30-minute and 15 minute frequency respectively Monday to

Saturday. On Sunday the frequency of service is 60 minutes and 20 minutes respectively. The potential for public transport trips is significant as a 30-minutes travel journey from the site covers north Sunderland, Washington, parts of Pelaw, parts of Hebburn, South Shields, Southwick and Castletown.

5.41 In addition to the Transport Statement and Access and Transport Chapter of the ES, this planning application is accompanied by the following:

- **Framework Travel Plan** – which encourages trips by sustainable modes of transport. It includes a range of measures including provision of an information pack to new staff members and for visitors to inform them of the travel options, various initiatives to promote walking, cycling and the use of public transport, initiatives to promote smarter car use including car sharing and the use of low emission vehicles and flexible working (where appropriate);
- **Highways Operational Management Plan (HOMP): Envision Chapter** – A HOMP has been previously been agreed for IAMP ONE with the Council's Highways Department and with Highways England. Its purpose is to ensure that adequate measures are in place to manage the traffic and parking impacts associated with the operation of the IAMP ONE. The HOMP is an evolving document which can be reviewed and updated, in consultation with the Council and Highways England. Each end user needs to complete an individual chapter of the HOMP which seeks details of shift patterns, staff numbers, the Travel Plan co-ordinator, car parking and cycle parking. Envision has completed the relevant chapter of the HOMP. They will comply with the requirements of the HOMP and will ensure that any conflict with operations with Nissan are minimised through off-setting their shift change over times; and
- **Initial Public Transport Strategy:** This sets out the strategy for public transport for IAMP. The document was originally prepared in October 2020 and has been updated in March 2020 and again in July 2021. The most recent update reflects that Covid-19 has delayed the implementation of aspects of the strategy.

Flood Risk and Drainage

5.42 A Flood Risk Assessment and Drainage Strategy has been prepared by Systra to accompany the planning application. The assessment develops a full appreciation of possible flood risks to the proposed development and other properties in the surrounding areas that may be affected as a result. It also identifies suitable strategies for managing the drainage needs of the proposed development in accordance with national planning requirements. The assessment sets out that the application site lies almost entirely within Flood Zone 1 (areas with less than 0.1% chance of flooding every year), however, Flood Zone 2 encroaches onto the northern end of the application site and affects part of the site entrance off International Drive. Notwithstanding this, the assessment concludes that that is a very low risk of fluvial flooding at present, with a very low residual risk of flood flows crossing the northern end of the site continuing down to the A1290 and across Washington Road and towards the Nissan factory.

5.43 The risk categories for surface flooding align with those for fluvial flooding. The EA's indicative mapping for surface flooding across the IAMP development indicates that the application site is of very low risk of surface water flooding. The surface water flooding identified at the northern corner of the site correlates with the fluvial flooding extents and does not affect the proposed development to any greater degree. Overall, surface flooding is considered to present a very low risk, with isolated areas of the site known to be prone to ponding or waterlogging in prolonged wet weather at present.

- 5.44 There is also no material risk from groundwater identified within the wider IAMP ONE Phase 2 site boundary. Groundwater is therefore not considered to pose any meaningful risk of flooding to the site and has been identified as low risk.
- 5.45 The proposed development is to be elevated compared with existing ground levels across its lower northern section so that the predicted overland flow route from increasing fluvial flood risk is impeded or blocked outright to protect both the development and the Nissan plant. The floor levels will be set at 600mm above the design flood level (35.65mOD) based on the vulnerability classification. Post development, the risk of external surface flooding affecting the site is minimal due to the absence of large paved areas surrounding the proposed development to shed run off quickly onto the site. The proposed development also creates significant areas of paved surface and building roofs, which significantly increases the rate of runoff from the site. The surface drainage approach for this scheme will rely upon underground storage tanks, porous paving for parking areas, filter drains for internal roads and proprietary oil separators in order to achieve the required train of treatments for the proposed outfalls.
- 5.46 The provision of a new surface drainage system as part of the development will therefore collect and manage runoff, with the setting of floor levels higher than external surfaces further preventing the risk of internal flooding in such conditions. The residual risk of increased runoff and surface flooding at storm conditions above the drainage design standards have therefore been identified as low. Surface flooding is considered to continue to pose a low risk of flooding overall for the site's development form given the provision of the new drainage system.
- 5.47 With respect to groundwater flooding, the proposed development will harden the majority of the site surface and divert rainfall away from soaking into the ground and into the new surface drainage system. This is not considered to materially alter the local groundwater behaviour given how poorly permeable is the superficial material. Any water ponding on adjacent waterlogged ground that spills onto the development, if ground levels permit, will be collected by the drainage system. Groundwater is therefore considered to continue to pose a very low risk of flooding overall for the site's development form.
- 5.48 The site's development run-off is to be managed according to the natural catchment to which it drains. Run-off from areas draining towards the Usworth Burn will be attenuated on site before passing into a flood-compensation area with a series of shallow basins or scrapes as part of the wider IAMP habitat mitigation works north of the site. Flow rates are to be restricted to the greenfield equivalent for the corresponding return periods. These equate to 3.3, 6.7 and 8.0l/s/ha at the 1-year, 30-year and 100-year storm condition respectively.
- 5.49 Run-off from areas draining into the Hylton Dene Burn system are to be drained into the new IAMP ONE surface-drainage system and restricted to the existing Q₁ Greenfield rate for storm conditions up to and including the 100-year+40% condition. This attenuation and flow control are to be provided within the development site limits, discharging only the attenuated flow to the IAMP ONE system or to the river as appropriate.
- 5.50 The proposed development's internal layout does not directly align with the natural catchment boundary, however the internal surface drainage systems have been managed to apportion the drained areas between the two receiving watercourses matching the pre-development condition.
- 5.51 The design for the wider IAMP ONE and IAMP TWO surface-drainage system has been adapted to include the increased development area for this site. The outflows remain within the target limits as required at the three key return periods (1, 30 and 100-years) with a Climate Change allowance of 40% over the 1 in 100yrs storm events.
- 5.52 The development's foul drainage needs will be met by connecting the site into the IAMP ONE trunk foul sewer system. This drains to a nearby sewage pumping station which transfers foul

flows to a large combined sewer some distance west of the site near Washington. This in turn conveys flows to NWL's sewage treatment works near Barmston.

- 5.53 The future development site owner(s) and operator(s) are to be responsible for constructing, owning and maintaining both foul and surface water systems within the site boundary.
- 5.54 IAMP LLP and their site development partner will own and maintain the surface drainage system outside the development plot. NWL will adopt and maintain the trunk foul sewerage outside of the development site. The Water Resources Chapter of the ES identifies and assesses the effects of the proposed development during the construction and operational stages on water resources and the water environment of the local area, including flood risk.
- 5.55 The assessment has concluded that, with appropriate mitigation in place, the level of potential effects would be no greater than negligible and not significant. Additionally, an assessment of potential cumulative impacts as a result of the wider IAMP development and additional nearby developments has concluded that any cumulative impacts on the water environment would be no greater than negligible and not significant.

Ecology, Landscape and Trees

- 5.56 A range of new habitats are proposed as part of the comprehensive on-plot landscape strategy. These measures include extensive native tree planting; an extensive native buffer shrub (i.e. scrub) planting mix; a native hedgerows mix; and a native wet woodland shrub mix; and a native marginal planting mix. An ornamental shrub mix closer to the buildings will provide further habitat for wildlife, as well as year-round visual amenity for the development. Areas of grassland proposed comprise wildflower meadow (Emorsgate EM1 mix), flood meadow (Emorsgate EM8 mix), and shade-tolerant wildflower mix (Emorsgate EH1), all subject to appropriate management, as well as areas of more closely mown lawn closer to the buildings. The landscape strategy is provided in Chapter 3.0 of this report.
- 5.57 The proposed landscape strategy ensures a measurable biodiversity net gain in accordance with national and local planning policy.
- 5.58 The proposals to include extensive tree planting accord with paragraph 131 of the revised NPPF (July 2021) which recognises that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. This paragraph goes on to advise that opportunities should be taken to incorporate trees in developments.
- 5.59 The Ecology and Biodiversity Chapter of the ES assesses the impact of the development proposals on the ecology and biodiversity of the site, describing the baseline conditions and the effects of the proposed development; outlining the mitigation measures required to avoid, reduce or compensate for any significant adverse effects; and setting out the likely residual effects after measures have been adopted.
- 5.60 The application site does not lie within nor in close proximity to any designated areas of ecological interest. Analysis of the ecology interested of the application site has identified this to be of no greater than local level. No significant adverse effects on the ecology and biodiversity of the local area are predicted, including cumulative effects. Mitigation and compensation measures are proposed to ensure that the development of the site can make a long term, positive contribution to the local ecology and biodiversity interest of the area. Mitigation measures include the provision of barn owl and bat boxes to compensate against the loss of barns within West Moor Farm.

5.61

- 5.62 In conclusion, no significant adverse inter-cumulative effects have been identified with respect to ecology and biodiversity.

Landscape and Visual Assessment

- 5.63 The Landscape and Visual Impact Assessment ('LVIA') Chapter of the ES identifies and assesses the effects of the proposed development on the landscape character and the visual amenity of the application site and surrounding area. The sensitivity of the landscape, present receptors and the surrounding character areas have been considered to inform the consideration of effects arising from the proposed development.
- 5.64 The application site predominately flat, with a relatively nondescript farmland on the northwest edge of Sunderland, immediately north of the Nissan manufacturing facility. The site comprises rectilinear fields of varying sizes, primarily in arable use (where not under construction for IAMP ONE). Fields are enclosed by straight, generally gappy hedgerows with occasional hedgerow trees. Small triangular plantations and copses are present within and break up the landscape, as does the vegetation lining the River Don, on the boundary between Sunderland and South Tyneside. West Moor Farm is located on the southern boundary, adjacent to the A1290. The site lies directly adjacent to the Green Belt to the north. A Green Belt designation is a planning control designation and does not provide any indication of landscape quality or condition.
- 5.65 Overhead electricity transmission lines on steel towers forms the north-western boundary of the Site, running from north-east to south-west through this area.
- 5.66 The site is not subject to any statutory landscape designations and is considered to be of 'low' sensitivity, given that it is a previously disturbed, fragmented landscape of comparatively low scenic quality, which is commonplace throughout the wider region.

Construction Phase

- 5.67 The proposed development would result in construction work taking place in close adjacent to the ELMA, which is allocated as Green Belt. The value of Green Belt land can be considered to be at best medium, given that its purpose is to separate built-up areas; the susceptibility of the area of Green Belt closest to the proposed development is assessed as low given that no development would take place on Green Belt land. The sensitivity of this area, to the proposed development, is therefore assessed as low-medium. Overall, the construction effects would be both indirect and temporary and are therefore assessed as not significant. There would be changes to the character of the landscape from the presence of plant and machinery within the application site, as well as from the permanent loss of internal lengths of hedgerow and some hedgerow trees. Effects would be adverse, however, not significant.
- 5.68 Minimal changes to the landform are anticipated. Lighting would be required during construction, particularly in winter months for security purposes. Lighting would be short term and temporary and as above, effects would be adverse but not significant.
- 5.69 Effects of construction on the landscape character area within which the application site is located are assessed as a high magnitude of effect, on a low-medium sensitivity receptor and would therefore not be significant. Indirect effects on the wider landscape areas are also assessed as not significant.

Operational Phase

- 5.70 Having regard to the operational phase of development, the operational effects of the proposed development would be permanent and long term. Indirect effects of the adjacent areas of Green

Belt land from the presence of the completed development would be partially buffered by the perimeter landscaping of the application site, which has been assessed as not significant.

- 5.71 With respect to the effects of the proposed development on visual amenity, there is relatively limited existing visibility of the application site from within the surrounding area. This is mainly limited to locations close to the site, or more distant, elevated positions to the north-west and south of the site. Effects have been assessed for the operational stage of the development only, as it is considered that the short-term nature of construction works would not give rise to significant effects on visual amenity.
- 5.72 The adjacent area of Green Belt land, to the west and north of the site, is being brought forward as ELMA and management operations will ensure that there are longer-term beneficial effects on the ecological interests of the local area, and on the character of the landscape. In addition, perimeter landscaping to the IAMP site would provide some separation between the two areas as well as forming a new defensible boundary on the edge of the Green Belt; as this planting establishes over time, the effectiveness of this would increase, though would not reach the height of a 30m high building. Any indirect effects on the low-medium sensitivity Green Belt land are assessed as of medium-high magnitude and would result in indirect, permanent adverse effects and would not be significant.
- 5.73 Significant effects on visual amenity have been identified for the occupants of North Moor Farm to the immediate north of the site. It is recommended that consideration be given to the provision of additional hedgerow trees within the hedgerows to the south, east and north-east of North Moor Farm, planted as heavy standards which would reduce the effects to not significant in the longer-term. Significant effects for the occupants of the properties at Hylton Bridge Farm and two roadside properties at Hylton Grove Farm have also been identified; however, the effects on these properties in the longer-term will be reduced to not significant as the perimeter planting matures. No other significant visual effects have been identified for residential receptors.
- 5.74 In terms of transport routes and rights of way, no significant effects on visual amenity have been identified for users of the A1290 or other roads or rights of way, including the dismantled railway line on the eastern edge of Washington to the west of the application site. Views from the A1290 within the section of road passing the site, when assessed in their totality, would experience a range of near distance, transient and oblique views of the application site, seen in the context of the wider industrial development of the area. This has been assessed as not significant.
- 5.75 Six viewpoints have been selected as part of an appraisal of key views. The viewpoints included in the assessment comprise two points on the A1290 to the west and east of the site; a view from Penshaw Monument to the south of the site; and three views from Follingsby Lane to the north. For the viewpoints at the A1290 to the west, Penshaw Monument and Follingsby Lane, no significant effects on visual amenity have been identified for any stage of the proposed development, including cumulative visual effects. At the junction of the A1290 with the new access road into the IAMP ONE development, there would be significant effect on visual amenity associated with the near distance views of the developed site from this location, for the short to medium term associated with the establishment of internal and perimeter planting. Effects on visual amenity during construction are not assessed as significant. Cumulative effects at this viewpoint are predicted to be significant for the combination of the Site with the wider IAMP ONE Phase One development in the short to medium term; in the longer term, with the assimilation of the development into the general area, and the establishment of the perimeter and internal landscaping, cumulative effects would reduce to below significant levels. No other significant cumulative effects are identified for this viewpoint.

- 5.76 Mitigation is proposed with respect to the landscaping of the application site perimeter comprising native trees and scrub. Other means of mitigation will include reinforcement of the hedging alongside the A1290 including hedgerow tree planting.
- 5.77 In conclusion, the LVIA confirms that the proposed development would result in limited significant effects on the landscape character and landscape resource of the area, restricted to the operational stage of development; and limited significant effects on visual amenity, also during the operational stage of development, for properties close to the site.
- 5.78 In the longer term, with the assimilation of the proposed development into the general area and the implementation of the proposed mitigation, it is considered that there would, overall, be scope for positive effects on the landscape character, resource and visual amenity of the local area.

Cultural Heritage and Archaeology

Heritage

- 5.79 The proposed development would have a negligible adverse impact on the significance of Penshaw Monument as a result of changes within its setting and loss of glimpsed views of the monument from the north-east corner of the site and along International Drive. The views from International Drive have only been made possible by the recent construction of the road and the views from this location are not integral to understanding and appreciating the significance of the monument. The proposed development will be seen from the monument in the context of a highly industrialised setting to the north.
- 5.80 The significance of the monument derives from its historic association with the first Earl of Durham, its architectural significance as an important example of the Greek revival in the region and its role as a prominent landmark across a wide area. These aspects of the monument's heritage significance will be unaffected by the proposed development. The proposed development will have a very localised impact on the setting and its special interest would be preserved. Although the setting and views towards the monument play a role in its significance as a landmark, views of the monument are possible for miles around and the proposed development will have a very localised impact, making the monument less sensitive to the proposed development.
- 5.81 Given that the setting makes a limited contribution to the significance of Downhill House and the listed buildings at Downhill Farm and the site is a distance feature of the setting seen in the context of surrounding development, the proposed development would have a negligible adverse impact on the setting of these heritage assets. Their architectural and historic significance would be unaffected.
- 5.82 Overall, the siting, form and design of the proposals are appropriate within the established context of the proposed development. The proposed development is, therefore, in accordance with the NPPF, as well as Policies BH7 (Historic Environment), BH8 (Heritage Assets) and BH11 (Scheduled Ancient Monuments) of the CSDP.
- 5.83 The proposed development would not sustain the significance of the non-designated West Moor Farm as the development would require the total demolition of the farm complex. However, the historic and architectural significance of these buildings is negligible given the extent of historic alterations to the buildings, the lack of noteworthy historic and architectural features of significance and the extent of change within the immediate setting of the farm buildings. Whilst the proposed development would have a major impact on this non-designated heritage asset, its significance is low. The demolition of these buildings is being progressed and assessed via a

separate planning application which is currently being considered by Sunderland City Council (application reference 21/01330/FUL).

5.84 Overall, the proposed development will produce a negligible adverse effect on designated heritage assets in the surrounding area and total loss of a non-designated heritage asset (albeit the loss of the non-designated heritage asset is being assessed via a separate planning application). This triggers the requirement to balance harm to heritage with public benefits set out in the Paragraphs 202 and 203 of the NPPF.

5.85 In this case, it is considered significant weight should be afforded to the most substantial economic benefits associated with the development, which includes an investment of £450 million in the facility and the employment of 1,000 workers, outweighs the negligible adverse effects on the designated heritage assets in the wider area and the total loss of a non-designated heritage asset. As such, it is considered that the proposed development complies with the requirements of the NPPF in this regard.

Archaeology

5.86 The fields within the redline boundary have previously been included in a geophysical survey. Possible soil-filled features were identified in some areas of the site along with field boundaries and traces of ridge and furrow. The fields located to the east of West Moor Farm have undergone trial trenching. The remains of medieval or post-medieval ploughing were recorded and it was agreed with the Tyne and Wear Archaeology Officer that no further mitigation was required. A watching brief has also been undertaken during geotechnical investigations of the proposed development area.

5.87 The triangular plot of land located along the west side of the redline boundary, to the west of West Moor Farm, was subject to evaluation trenching in 2021 by AD Archaeology. No significant archaeological features were located in the evaluation trenches. The only features located were shallow furrows belonging to former post-medieval ploughing regimes. In view of these results no further archaeological work was recommended in the Archaeological Evaluation report prepared by AD Archaeology.

5.88 The proposals are therefore considered to comply with the NPPF and Policy BH9 (Archaeology and recording of heritage assets) of the CSDP given that appropriate archaeological evaluation has taken place and that no significant finds have been discovered.

Air Quality

5.89 The Air Quality Chapter of the ES has been prepared by Wardell Armstrong, who completed an Air Quality Screening Assessment to consider the potential air quality effects during both the construction and operational phases of the proposed development.

5.90 During the construction phase, the implementation of effective mitigation measures will substantially reduce the potential for nuisance dust and particulate matter to be generated, which can be secured by way of a planning condition. The assessment has identified that the risk of dust soiling and human health effects is not negligible for all the activities and therefore site-specific mitigation will need to be implemented to ensure dust effects from these activities will not be significant. Best practice dust control measures are recommended and will be set out in more detail within a Dust Management Plan, prepared as part of a Construction Environmental Management plan which can be secured by way of planning condition.

5.91 A qualitative review of the potential air quality effects during operation of the development has been undertaken, which indicates that the pollutant concentrations in the local area are well below the air quality objectives and limit values. All traffic arising from IAMP ONE has been

assessed in the 2018 IAMP ONE ES and 2020 IAMP ONE Phase Two ES. The planning application was granted, and the Air Quality Chapters concluded a Negligible (Not Significant) effect upon air quality. There are also no vehicle increases proposed as part of the development, when compared to the number of trips previously assessed and, therefore, there will be no adverse air quality changes arising. A negligible (not significant) effect is predicted, and no significant cumulative impacts on air quality have been identified.

- 5.92 The proposed development therefore complies with IAMP AAP Policy EN4 (Amenity) and CSDP Policies SP7 (Health and wellbeing).

Noise and Vibration

- 5.93 The Noise Chapter of the ES assesses the likely significant effects of the proposed development on the nearest Existing Sensitive Receptors at North Moor Farm. Potential noise impacts are assessed for the construction and operational phases of development using a combination of measured and predicted noise levels.
- 5.94 The baseline noise levels at North Moor Farm have been taken from those identified within the previous IAMP ONE application. Baseline data was used to establish potential threshold for construction noise which were compared to predictions of construction noise levels.
- 5.95 The effects of noise during construction was found to be **Not Significant** and no mitigation measures are required. The use of best practice during construction should, however, be employed in order to reduce the level of effect of potential impacts and examples have been provided.
- 5.96 In the absence of detailed information, indicative noise predictions have been carried out for the potential noise sources during the operational phase. The predicted noise levels at North Moor Farm were compared to background levels. The noise modelling work has predicted that the noise levels at North Moor Farm will just exceed permitted levels during the night when compared against background noise levels. To provide appropriate mitigation, a 1m high acoustic fence is proposed along the western boundary. The fence will be situated within the landscaping buffer and as such would not be visible from North Moor Farm or the Green Belt once the planting grows. Taking into account this mitigation, the effects of noise during operation is predicted to be below background levels and **Not Significant**. Indicative mitigation measures are suggested and will be reviewed at the detailed design stage. No cumulative noise impacts have been identified.
- 5.97 Taking the above into account, it is considered that there will be no harmful noise effects and hence the proposed development complies with IAMP AAP Policy EN4 (Amenity) and CSDP Policy HS2 (Noise-sensitive development).

Amenity

- 5.98 The closest residential property is North Moor Farm, situated over 170 metres to the north.
- 5.99 Any future contractors will have to prepare a Construction Environmental Management Plan and Construction Traffic Management Plan which will include details of how the environmental effects of the construction phase can be reduced. This will help reduce the impact on residential amenity.
- 5.100 During the construction period, the measures could include:
- when works are taking place within close proximity to North Moor Farm, screening of noise sources by temporary screens may be employed;

- all machinery should be regularly maintained to control noise emissions, with particular emphasis on lubrication of bearings and the integrity of silencers;
- site staff should be aware that they are working adjacent to a sensitive area and avoid all unnecessary activities due to misuse of tools and equipment, unnecessary shouting and radios;
- as far as possible, the avoidance of two noisy operations occurring simultaneously in close proximity to the same sensitive receptor;
- adherence to any time limits imposed on noisy works by the local authority;
- implement set working hours during the week and at weekends;
- ensure engines are turned off when possible;
- should construction activities need to be carried out during night-time hours (for example concrete pours), advance notice and details of any night working will be provided to the occupiers of North Moor Farm and to the Local Planning Authority;
- provision of a Dust Management Plan to provide measures for the control of dust; and
- any site lighting to be appropriately designed to ensure it does not cause light pollution.

5.101 During operation, the noise modelling work has predicted that noise levels at North Moor Farm will just exceed permitted levels during the night when compared against background noise levels. To provide appropriate mitigation, a 1m high acoustic fence is proposed along the western boundary.

5.102 With regard to visual amenity, significant effects have been identified for the occupants of North Moor Farm. It is recommended that consideration be given to the provision of additional hedgerow trees within the hedgerows to the south, east and north-east of North Moor Farm, planted as heavy standards. This would reduce the effects to not significant in the longer-term.

5.103 Overall, the proposed development complies with CSDP Policies SP7 (Health and wellbeing), HS1 (Quality of life and amenity) and HS2 (Noise sensitive development), as well as IAMP AAP Policy EN4 (Amenity).

Health

5.104 A Health Impact Assessment ('HIA') has been prepared by Lichfields to accompany the planning application. The HIA assess the potential impacts of the proposed development upon the health of the local population by looking at the changes to the determinants of health and the pathways that could have temporary and permanent impacts upon the population of the baseline area.

5.105 Overall, the HIA identifies mainly neutral or positive effects on health. With regard to access to open space and nature, the development is anticipated to have a positive impact on health. The landscaping scheme has been designed to include trees, hedgerows, shrubs, grasses and large swathes of wild flowers to provide seasonal interest, optimise biodiversity, enhance legibility and create an attractive and welcoming environment. The masterplan also includes areas of green space and grassing which can be used by staff for recreational use during work breaks.

5.106 Potential health impacts relating to accessibility and active travel are positive. The site is well connected to the existing pedestrian and cycle networks and public transport, with measures being set out in the Framework Travel Plan, and subsequent Full Travel Plan, which will seek to promote walking and cycling, which may have positive health impacts particularly for employees with health conditions that are worsened by physical inactivity. Pedestrian access to buildings will be segregated from vehicles and mitigation measures for construction vehicles will be set out in the CEMP. A potential neutral/slight adverse impact on health may result from provision

of car parking spaces, which may encourage some employees to drive to the site. However, the ratios of parking provision are considered to be appropriate to cater for likely operational needs and are in line with SCC parking standards. Again, measures to reduce the number of single occupancy car trips will be set out in the Framework Travel Plan and Full Travel Plans. Wheelchair-accessible parking and level access will be provided, ensuring access to employees or visitors with mobility problems.

- 5.107 With regard to air quality, noise and neighbourhood amenity, during the construction phase a CEMP will be used to help reduce the construction related impacts. This management plan will include a range of measures including measures to reduce noise levels, minimise dust and to ensure that construction traffic uses defined routes. During operation, it is not anticipated that there will be any processes likely to emit significant pollutants from point sources and any processes likely to generate significant vibration will be damped.
- 5.108 The proposed development will provide significant numbers of new jobs, likely to have positive health benefits for unemployed people or those on low incomes in the local area, where there is significant deprivation. Measures should be implemented to increase local skill levels and promote local recruit to maximise these potential health benefits.
- 5.109 In terms of climate change, the building has been designed to include solar photovoltaic panels on the roof and to use air source heat pumps in the office accommodation. The proposed development will be designed with a view of achieving a BREEAM 'Very Good' rating and hence the impacts of the project will be considered from a lifecycle perspective (i.e. from concept stage through to a fully constructed building). This includes driving sustainable building approaches and technologies. Appropriate vehicle charging infrastructure to reduce emissions will be provided. Measures to minimise waste are set out within the Waste Management Plan in the CEMP.
- 5.110 With regard to minimising use of resources, the proposals include sustainable design and construction techniques wherever possible. Reuse of material is promoted within the Waste Management Plan. Building materials with recycled content will be used wherever practicable.
- 5.111 Overall, this proposed development is considered to have primarily positive or neutral permanent benefits on health and accords with Policy SP7 (Healthy and safe communities) of the CSDP which relates to improving health and well-being in Sunderland by promoting and facilitating active and healthy lifestyles.

Climate Change

- 5.112 The Climate Change Chapter of the ES reports the likely significant effects of the proposed development with respect to climate change and risk mitigation in the context of the site, surrounding area and the wider environment.
- 5.113 The methodology compares the likely emissions arising from the proposed development, relative to the baseline of a similar 'typical' development. This approach follows the 2019 technical note from the European Bank for Reconstruction and Development (EBRD) which states that this type of baseline is appropriate since "it is recognised that 'something' must be done" and allows for a comparison of relative effect(s). This differs from the IEMA guidance published in 'Environmental Impact Assessment Guide to Assessing Greenhouse Gas Emissions and Evaluating'. Their approach to 'Significance' suggests that all emissions are significant and, therefore, unless a project is removing as much carbon from the atmosphere as it is emitting, its impacts will be considered as Significant. The IEMA method does not, however, enable the scale of effect to be identified and for which measurable mitigation measures can be identified that reduce the residual effects to within an acceptable level. In this case, using the approach

recommended by the EBRD is considered to provide a robust method for comparing the emissions from the proposed development against the baseline of a similar 'typical' development.

- 5.114 The proposed development's absolute emissions with embedded mitigation were modelled to be significantly below the baseline emissions (from a 'typical' similar development) which is a positive major beneficial impact. The emission saving achieved over the 60-year project lifetime was reduced when taking into account the decarbonisation of the national grid which negates any additional savings over a longer timeframe. The applicant is considering measures that exceed the minimum standards required by Building Regulations as well as meeting the Future Buildings Standard. Overall, this represents a positive impact which is Significant.
- 5.115 This should not be interpreted as the proposed development having no impact on climate change through greenhouse gas emissions. It signifies that the proposed development is taking measures that will improve the overall impact above a development of the same size, with comparable facilities, constructed to Building Regulations. No account has been taken of the fact that the car batteries produced will improve the sustainability of vehicles.
- 5.116 The overall significance of future climate change on the proposed development is deemed to be Not Significant. This assessment is based on the reasonable assumption that the proposed development will meet the minimum standards required by Building Regulations in place at the time of construction and will implement mitigation measures to reduce GHG emissions and build in resilience to future changes in climate.
- 5.117 It will not be possible to eliminate every risk associated with climate change but through intelligent design, preparation and responsible construction, these risks will be minimised. Discussion and recommendations have been detailed reducing these risks in key areas such as overheating, flooding and extreme weather, which has taken into consideration not only the health and safety of the users of the proposed development, but the resilience of the proposed development itself. It is assumed that with the mitigation each individual discipline throughout the ES has suggested, there will not be a significant impact on the development as a result of climate change in the long-term.

Energy and Sustainability

Energy Statement

- 5.118 An Energy Statement has been prepared by Wardell Armstrong to accompany the planning application. The statement has been developed through consideration of the predicated energy demand across the development and the application of the energy hierarchy to reduce energy use and thereby minimise carbon emissions.
- 5.119 The proposed development will be designed with a view of achieving a BREEAM 'Very Good' rating and hence the impacts of the project will be considered from a lifecycle perspective (i.e. from concept stage through to a fully constructed building). This includes driving sustainable building approaches and technologies.
- 5.120 The 'Be Lean' element of the energy hierarchy is concerned with reducing energy demand. This has been applied through passive sustainable design measures and the use of modern methods of construction and improved specifications for building fabric efficiency. The 'Be Clean' element of the energy hierarchy focusses on supplying energy more efficiently. This usually entails consideration of district heating networks or combined heat and power generation. Neither of these options are considered practical or viable in this proposed development. The 'Be Green' element of the energy hierarchy involves the use of renewable technologies to reduce the carbon emissions associated with supplying the energy demands for the Development. The

Energy Strategy set out in this report uses Solar PV as the primary means of reducing carbon emissions, along with Air Source Heat Pumps (ASHPs) in the office areas, improved fabric efficiency and potentially Waste Water Heat Recovery ('WWHR').

- 5.121 The energy demand from the proposed development is split between regulated energy to operate the building facilities and unregulated energy which is used for running the manufacturing processes. There is a strong desire to decarbonise the production process but at present gas is the normal source of the heat that is required. If it can be demonstrated to be technically viable and affordable to do so, the plant will adopt an all-electric approach which will be much easier to decarbonise as the electric grid itself decarbonises. There will also be potential for additional onsite renewables to be added to the energy supply.
- 5.122 The mitigation proposed includes rooftop solar PV installation and the ASHPs that are proposed for the office spaces. This installed capacity of the solar PV panels is expected to generate 5,020MWh over the course of a year. However, these measures alone may be insufficient to meet the Future Building Standard so it is anticipated that enhanced fabric will be incorporated and WWHR may also be required to help deliver the target 27% emission reduction for regulated emissions. SBEM assessments will help determine this once final detail of internal design and fit out is confirmed. In all cases the minimum building regulations will be met or exceeded.
- 5.123 It is proposed that ongoing monitoring will take place through ongoing analysis of energy use statistics and ensuring mechanisms are in place to optimise use and increase efficiency wherever possible. In the unlikely event that regulated energy use is not performing as expected, remedial action will be undertaken to ensure that these minimum standards are complied with, either through snagging improvements or through additional or alternative upgrade measures should this be necessary will be considered to ensure that, as a minimum, the proposed targets are met.

Sustainability Statement

- 5.124 A Sustainability Statement has also been prepared by Wardell Armstrong to accompany the planning application. The statement outlines how the proposed development will meet the various sustainability objectives in line with relevant national and local policy requirements.
- 5.125 Following a review of the relevant national, regional and local sustainability objectives, the following sustainability topics have been identified, against which the proposed development have been evaluated:
- Waste & Recycling (includes Construction & Demolition);
 - Flood Risk;
 - Development Ratings;
 - Materials;
 - Energy;
 - Water;
 - Pollution;
 - Biodiversity;
 - Secure Design;
 - Contaminated Land;
 - Travel; and

- Adapting to Climate Change.

- 5.126 The statement demonstrates the approach that has been taken to sustainability during the design process and considers the extent to which the proposed development meets with the principle of sustainable development. Consideration has been given to where the proposed development accords with national and local planning policy comprising the NPPF, the CSDP and AAP.
- 5.127 Strategies and initiatives to help address any remaining discrepancy have been proposed. It is suggested that once the initiatives been adopted, the Proposed Development will meet the national and local planning policy and sustainability criteria set out by both the Local Authority and the Applicant themselves.

Glint and Glare Assessment

- 5.128 A Glint and Glare Assessment has been undertaken that assesses the possible effects that reflected sunlight from the proposed roof mounted solar PV panels would have on receptors in the vicinity. These receptors include residential properties, road, rail, air traffic and national trails. This Assessment has not identified any harmful effects. One road (Follingsby Lane) was predicted to potentially receive glint due to lack of complete screening. This road lies north of the proposed development. However, given that the panels will be tilted at a relatively shallow angle, more intense sunlight during the summer will be reflected upwards. When glint does occur, motorists travelling on this road will not directly face the site while they are moving, and views will be partially screened by intervening trees. Glint will be less intense than direct sunlight, which motorists routinely experience. Owing to the intermittency and low intensity of glint that can theoretically be experienced on this road, it is unlikely that the glint received would pose a material risk to motorists, nevertheless anti-reflective measures are recommended for north-facing solar panels.

Geology, Ground Conditions and Soils

- 5.129 There are no designated geological sites within or close to the Site boundary. The bedrock of the site area comprises the Pennine Middle Coal Measures formation; this consists of interbedded grey mudstone, siltstone, sandstone and, commonly, coal seams. The thickness of this formation is typically in the order of 200m.
- 5.130 Groundwater vulnerability across the area is mainly designated as 'soils of low leaching potential'. Pollutants are unlikely to penetrate the soil layer as water movement is largely horizontal; some soils may have the capability of attenuating diffuse pollutants. Lateral flow from these soils can contribute to groundwater recharge elsewhere in the catchment.
- 5.131 The site does not lie within a drinking water safeguarded zone; there are no groundwater source protection, inner or outer zones within the local area. There are no licensed abstractions or discharges within the area of the Site. Groundwater quality within the area is uncharacterised as the superficial deposit aquifer is designated as 'unproductive strata'. The historical agricultural use of the land will have influenced the quality of the groundwater in the superficial deposits.
- 5.132 Mining has occurred historically within the wider area and two shallow coal seams (Top Hebburn Fell and Bottom Hebburn Fell) subcrop some 0.7km to the south-west of the Site.
- 5.133 With the exception of West Moor Farm and associated infrastructure, all land within the Site is agricultural and has been under arable rotation since at least 2001. The 1996 ADAS survey describes the Site as 'under cereal stubble, recently sown winter cereals and oilseed rape' and

the 2018 survey describes the Site as 'in an arable crop'. OS Mapping shows the Site to be relatively flat and at a height of 35-40 m AOD. All slopes on the Site are <7°.

- 5.134 There are no contamination issues at the site. The application site comprises Grade 3b agricultural land, with the concentrations of contaminating substances within the soil all below the Generic Assessment Criteria ('GAC') for commercial development of land. Organic substances (incl. phenol and Total Petroleum Hydrocarbon (TPH)) and asbestos were also absent from the soil.
- 5.135 No invasive plant species have previously been identified within the site area.
- 5.136 Effects on geology, soils and groundwater during the construction stage of the proposed development would be typically managed through the use of good construction practices, including compliance with relevant British Standards and the use of a Construction Environmental Management Plan (CEMP).
- 5.137 The soil at the Site are slowly permeable clay loams over clays; with characteristics indicative of the Foggathorpe 1 Association. These heavy textured soils are at very small risk of erosion. With the standard good practice measures and the embedded mitigation (by design), only minimal and temporary damage will occur. Loss of soil resources will be restricted to unavoidable small-scale (< 5%) losses arising from factors such as trackout of soils on construction vehicle wheels. The onsite and / or offsite reuse of soils will be prioritised (with disposal to landfill a last resort, only) and it is anticipated that the vast majority of soils would be reused. As such, the effect on soil is anticipated to be negligible.
- 5.138 In the context of the NPPF paragraph 183, the proposed development is not considered to be associated with any unacceptable risks from contamination or land stability and therefore is compliant with national policy. The proposed development is also considered to accord with CSDP Policy HS3 (Contaminated Land).

Loss of Agricultural Land

- 5.139 Paragraph 112 of NPPF requires LPAs to take into account the economic and other benefits of the best and most versatile agricultural land and states that '*where significant development of agricultural land is demonstrated to be necessary, LPAs should seek to use areas of poorer quality land in preference to that of a higher quality*'. The best and most versatile (BMV) agricultural land is defined in the NPPF as land in grade 1, 2 and 3a of the Agricultural Land Classification.
- 5.140 CSDP Policy NE12 (Agricultural Land) protects the BMV agricultural land (Grades 1, 2 and 3a), subject to various criteria.
- 5.141 The proposed development is located on 24.23ha of arable agricultural land plus 0.85ha of non-agricultural land (the site of West Moor Farm). Two detailed soil and Agricultural Land Classification (ALC) surveys have been conducted within the site, both showing the soils to be slowly permeable clay loams over clays, the wetness of which limits the agricultural quality of the land to ALC Subgrade 3b, which is a moderate quality and is not the BMV agricultural land.
- 5.142 The application site is allocated for development within the IAMP AAP and the principle of the loss of this land to agricultural use, in whole and in part, has been granted through the 2018 and 2020 IAMP ONE permissions. Furthermore, the proposed development would ensure the continued development and success of IAMP and would generate most important economic benefits, which should be given significant weight.
- 5.143 Although the land within the site would be permanently removed from agricultural use, the proposed development on Grade 3b agricultural land is considered to be acceptable and does

not conflict with the NPPF or CSDP Policy NE12. The land is allocated for employment development in an up-to-date plan, has planning permission for development and the land is not classified as a high enough grade to warrant further justification for development.

Waste

- 5.144 The Waste Chapter of the ES assesses the likely significant effects of the proposed development during the construction and operation phases on waste management, with both hazardous and non-hazardous wastes assessed.
- 5.145 The proposed development will require levelling and grading of the existing site, including excavation of an estimated 300 mm depth of topsoil from areas of agricultural land; construction of the new manufacturing building; construction of ancillary structures and infrastructure; and landscaping. The assessment focuses on the likely quantities and waste types arising from these activities and how they can best be managed.
- 5.146 It is expected that the majority of waste arisings will be sent for disposal to local landfill sites or to suitable offsite locations for re-use. The anticipated waste volumes form a small fraction of regional waste generation and capacity. Any hazardous waste arisings would be dealt with by a specialist hazardous waste operator.
- 5.147 In consideration of the above, **No Significant effects** have been identified as a result of waste arisings and management practices in relation to the proposed development. The proposed development is considered to comply with CSDP Policy WW6 (Waste management).

Summary

- 5.148 The site is allocated for light industrial, general industrial and storage & distribution uses with ancillary office and research & development floorspace as supporting uses within the up-to-date adopted development plan, the IAMP AAP. The proposed battery plant, being a general industrial use with ancillary office accommodation, accords with the site's land use allocation. The proposals will support the IAMP AAP objectives to build on the area's international reputation in the automotive industry; support Nissan and attract European-scale 'super-suppliers' linked to the automotive industry.
- 5.149 The proposed development is considered acceptable from a highways, transport, ecology, flood risk / drainage, landscape, visual, heritage, health, amenity, climate change, energy, ground conditions, noise, air quality and waste perspective. Importantly, the proposed development will have substantial economic and employment benefits.
- 5.150 The proposed development is considered to be in accordance with the up-to-date and relevant policies set out within the adopted Development Plan and, therefore, the presumption in favour of granting planning permission applies by virtue of Section 38(6) of the Town and Country Planning Act.
- 5.151 Further information on design and environmental / technical matters can be found within the accompanying documents, including the Environmental Statement.

6.0 **Compliance with the Draft IAMP Design Code**

6.1 This chapter considers the compliance of the Proposed Development against the Chapters 4 and 5 of the draft IAMP Design Code (Urbed, January 2018) which outlines different components that need to be addressed by the individual occupiers within the IAMP.

6.2 A separate Design Code is being prepared for IAMP TWO; however, this is specific to IAMP TWO and considers matters such as design principles for the main site infrastructure (which has already been agreed and implemented for IAMP ONE) and for the Hub (which lies outwith the planning application boundary). As such, for the purposes of this planning application it is considered more appropriate to use the previously prepared Design Code.

Plot Design Principles

Landscaping

6.3 The landscaping scheme will be designed to create an attractive and pleasant environment, which will help soften the impact of the development, particularly along the site boundaries which adjoin the ELMA and A1290. The landscaping strategy is discussed in Chapter 3 and compliance against Policy EN1 (Landscape) of the IAMP AAP is discussed in Chapter 5 of this report.

6.4 The detailed planting plans will be submitted for approval in due course; however, in accordance with the draft IAMP Design Code, the landscaping scheme includes trees, hedgerows, shrubs, grasses and large swathes of wild flowers to provide seasonal interest, optimise biodiversity, enhance legibility and create an attractive and welcoming environment. the landscaping scheme will include trees and shrubs, including both native species and evergreen species to provide year-round interest. The planting design will be appropriate to the size and scale of this building and will be robust and easily accessible for maintenance.

Lighting Strategy

6.5 The lighting scheme will be designed to ensure that light spill into the surrounding area is minimised as far as possible to reduce the impact on both ecology and on visual amenity. It is proposed that an external lighting scheme will be submitted to the Council for approval before the building is occupied and that such a scheme will be secured via a planning condition that would be attached to any permission.

6.6 In accordance with the draft Design Code, the lighting scheme will be designed to ensure that the site access, parking area and goods yards all have appropriate lighting levels. The car parking area will be well lit to ensure that users feel safe. Flood lighting will likely be used in the goods yards; however, it will be designed to minimise light spill.

Parking

6.7 In accordance with the draft IAMP Design Code, the car parking area has been situated as close as possible to the main entrance of the building, with disabled parking located at the closest possible point. The size of all spaces meet Council standards.

6.8 The proposed development makes provision for 725 parking spaces, comprising 685 for employees and 40 for visitors. Of these, 37 (5%) would be accessible located adjacent to the

main entrance. The development also makes provision for 40 electric vehicle ('EV') points, with provision to increase to 80 if future demand requires.

- 6.9 An appropriate number of cycle parking spaces (80) will be provided and will be situated in cycle shelter located in close proximity to the main staff entrance turnstiles. This ensures that the shelter is overlooked.
- 6.10 All car parking and pedestrian areas will be adequately illuminated to ensure that users feel safe.

Servicing / Emergency Access

- 6.11 Once within the site, the HGVs / delivery / service vehicles would travel through a gatehouse and along an access route which travels around the eastern, southern and western sides of the buildings. Signage would be provided to direct vehicles to the correct areas. A separate access lane is provided for any emergency vehicles adjacent to the gatehouse.
- 6.12 This approach will ensure that there is no conflict between service vehicles / HGVs, emergency vehicles and pedestrians, cyclists and cars.
- 6.13 Any refuse storage areas will be screened and discretely located away from the main building entrances.

Building Design Principles

Façade Treatment

- 6.14 In keeping with the draft IAMP design code, materials and colour have been carefully selected to ensure consistency with the IAMP palette. This will ensure consistency in design and will help visually harmonise the proposed building with the wider site, as well as the Nissan campus to the south. The overall approach has been to keep the appearance of the building simple, legible and uncluttered, whilst using articulation to provide emphasis and interest.

Active Frontage

- 6.15 The reception area, meeting rooms, office space and welfare accommodation are located on the north eastern corner of the building and face the main site entrance. They have been carefully located to provide a positive outlook for users within the building and to face onto the main site entrance which helps to create a strong interrelationship with those coming to visit. The main entrance has been carefully located to relate well to the surrounding environment.

Signage

- 6.16 Appropriate signage will be provided to provide advance notice and branding for the business, whilst also directing visitors to where they need to go.

Building Lighting

- 6.17 Any lighting on the building and in the goods yard will be designed and positioned to highlight the main entrances. Lighting will also be designed to reduce the impact of light pollution into the surrounding area.

Sustainable Design

- 6.18 The Energy Strategy uses Solar PV as the primary means of reducing carbon emissions, along with Air Source Heat Pumps (ASHPs) in the office areas, improved fabric efficiency and potentially Waste Water Heat Recovery ('WWHR'). Natural daylight will be maximised in the

officer areas. Further details are provided within the Energy Strategy and Sustainability Statement, as well as within Chapter 5.0 of this report.

7.0 Conclusion

- 7.1 This Planning Statement has been prepared by Lichfields on behalf of Envision AESC UK Ltd to accompany a full planning application for the development of a large-scale battery manufacturing plant on land at IAMP ONE, Washington.
- 7.2 Envision AESC UK Ltd is proposing to invest £450 million in the facility, which will confirm Sunderland as the heart of automotive electrification activities in the UK, building on both Nissan's and Envision AESC's initial investments in LEAF and the current battery plant. This is a unique and most exciting opportunity to help Sunderland and the UK become one of the best international locations for automotive and advanced manufacturing. The proposals will help ensure that Envision, the IAMP and Sunderland are at the forefront of innovations in battery technology and are playing a critical role in leading the de-carbonisation revolution through the promotion of clean energy and new energy electric vehicles.
- 7.3 The proposed development fully accords with the up-to-date and relevant planning policy provided in the adopted IAMP AAP and the CSDP through helping deliver the continued development of the IAMP for advanced manufacturing and automotive uses, whilst ensuring appropriate landscape and ecological mitigation is delivered.
- 7.4 This Statement has demonstrated that the proposed development constitutes sustainable development in the context of the NPPF. In particular it would have significant employment and economic benefits through helping drive forward economic growth within Sunderland and the wider region, including the creation of both temporary and permanent new jobs both during the construction and operational phases, increased economic output and increased business rates. Furthermore, the proposed development is considered acceptable from a highways, transport, ecology, flood risk / drainage, landscape, visual, heritage, health, amenity, climate change, energy, ground conditions, noise, air quality and waste perspective.
- 7.5 Overall, the scheme fully accords with the NPPF's commitment to support economic growth and deliver the business and industrial units that the country needs; the AAP's objectives to build on the area's international reputation in the automotive industry; support Nissan and attract European-scale 'super-suppliers' linked to the automotive industry; as well as the Northern Powerhouse objectives which seek to rebalance and growth the UK economy by fostering economic activity in the north of England.
- 7.6 There are no material considerations which out-weigh the scheme's overall conformity with the up-to-date development plan. As such, there should be a presumption in favour of the proposed development.

Appendix 1 Planning Policy Summary

IAMP Area Action Plan

1.1

A summary of the IAMP AAP policies that are not provided in Chapter TBC is as follows:

- Policy D1 (Masterplan Design) – provides the design concept and masterplan objectives for IAMP; to encourage a compact, permeable development which is attractive to future occupiers and flexible enough to accommodate a range of businesses. This includes maximising the interface with Nissan;
- Policy D2 (Public Realm) – provides the key principles for addressing the key public realm elements of the masterplan to deliver a scheme with a sense of place and which creates its own unity identity;
- Policy T1 (Highway Infrastructure) – identifies specific highway improvements, including upgrading the A1290; development proposals must be accompanied by a Transport Assessment and Travel Plan; and that consent will not be granted for development which adversely affects highway safety, comprises the delivery of highway improvements or prejudices the comprehensive development and delivery of the IAMP;
- Policy T2 (Walking, Cycling and Horse Riding) – the aspiration is for the IAMP to be an attractive sustainable multi-modal environment and this policy requires the delivery of a permeable pedestrian and cycle network within the IAMP. Bridleways will be provided to enhance access to the open space within the IAMP for recreational horse riders;
- Policy T3 (Public Transport) – requires the provision of enhanced bus services and associated facilities;
- Policy T4 (Parking) – development must ensure that appropriate provision for car parking is provided in accordance with the Council's standards;
- Policy IN1 (Infrastructure Provision) – requires the delivery of infrastructure to meet the needs of the development for electricity, gas, water and telecommunications. The provision of low carbon and renewable energy systems should be explored;
- Policy IN2 (Flood Risk and Drainage) – requires a Flood Risk Assessment and surface water drainage strategy to address drainage and flood risk, including SuDS provision. Evidence is required that there is sufficient capacity, both on and off-site, in the foul sewer network to support the development;
- Policy EN1 (Landscape) – this policy seeks to minimise the impact of the IAMP on the surrounding landscape, take opportunities to enhance the landscape and provide defensible boundaries for the Green Belt to prevent development sprawl. The designated Ecological and Landscape Mitigation Area (ELMA) is to provide the focus for necessary landscape impact mitigation, in addition to landscaping within the allocated employment areas;
- Policy EN2 (Ecology) – this policy sets out the principles to protect and enhance the ecological value of the IAMP and to encourage development based on sound sustainability principles. Again, this policy confirms that the ELMA land is to provide the focus for necessary ecological mitigation and compensation measures;
- Policy EN3 (Green Infrastructure) – this policy sets out the principles for the creation of Green Infrastructure, including retaining and enhancing existing mature trees, woodland and hedgerows around the edges of the development, the creation of green linkages along main roads and inclusion of informal open spaces to provide recreational and wildlife benefits and green links between habitats;

- Policy EN4 (Amenity) – this policy takes account of amenity considerations including noise, traffic, odours and dust during the construction and operational phases of the IAMP;
- Policy Del1 (Phasing and Implementation) – this policy seeks a Phasing Strategy with any application for proposed development; and
- Policy Del2 (Securing Mitigation) - this policy advises that mitigation will be secured via articles and requirements within a DCO or by planning obligations or planning conditions.

Sunderland Core Strategy and Development Plan 2015-2033

1.2 A summary of the CSDP policies is as follows:

- Strategic Policy SP1 (Development strategy) - provides a development strategy for supporting sustainable economic growth and meetings people's needs including creating at least 7,200 new jobs, particularly in key growth sectors;
 - Strategic Policy SP7 (Health and wellbeing) - provides criteria for improving health and wellbeing in Sunderland;
 - Policy HS1 (Quality of life and amenity) - new development should not have an unacceptable adverse impact on the quality of life and amenity which cannot be addressed through appropriate mitigation;
 - Policy HS2 (Noise-sensitive development) - development proposals which may generate noise should be accompanied by a noise assessment and appropriate mitigation should be provided;
 - Policy HS3 (Contaminated land) - where it is considered that land may be affected by contaminated land, development should ensure that appropriate investigations take place and that mitigation is provided;
 - Policy HS4 (Health and safety executive areas and hazardous substances) - development within the specified distances must take account of any risks involved and the need for appropriate separation distances;
 - Policy BH1 (Design quality) - development should achieve high quality design, which satisfies various criteria;
 - BH2 (Sustainable design and construction) - provides various criteria in relation to sustainable design and construction;
 - BH3 (Public realm) - existing and proposed areas of public realms should create attractive, safe, legible, functional and accessible public spaces; be constructed from quality, sustainable and durable materials; and incorporate public art, where appropriate;
 - Policy BH7 (Historic Environment) - should be valued, recognised, conserved and enhanced, sensitively managed and enjoyed for its contribution to character, local distinctiveness and sustainable communities;
 - Policy BH8 (Heritage Assets) - development proposals should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset;
 - Policy BH9 (Archaeology and recording of heritage assets) – applications that may affect buried archaeological remains must be supported by an archaeological desk-based assessment and evaluation reports, where appropriate. Preservation in situ is the preference. However, where the loss is justified in accordance with national policy, the remains should be appropriately recorded;
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- Policy NE1 (Green and blue infrastructure) - the aim is to maintain and improve the Green Infrastructure network by enhancing, creating and managing multifunctional greenspaces and bluespaces that are well connected to each other and the wider countryside;
 - Policy NE2 (Biodiversity and geodiversity) - where appropriate proposals must demonstrate how it will provide net gains in biodiversity and how it will avoid or minimise adverse impacts on biodiversity and geodiversity and;
 - Policy EN3 (Woodlands / hedgerows and trees) - relates to the conservation of significant trees, woodlands and hedgerows;
 - Policy NE9 (Landscape character) - the council will protect, conserve and enhance the varied landscape character;
 - Policy NE11 (Creating and protecting views) - views in to, out of and within development areas should be taken account of;
 - Policy NE12 (Agricultural land) – development which would result in the loss of best and most versatile agricultural land should be considered in the context of the agricultural land's contribution in terms of economic and other benefits;
 - Policy WWE2 (Flood risk and coastal management) – provides various criteria for reducing flood risk;
 - Policy WWE3 (Water management) – development must consider the effect on flood risk, on-site and off-site, commensurate with the scale and impact;
 - Policy WWE4 (Water quality) - the quantity and quality of surface and groundwater bodies and quality of bathing water shall be protected and where possible enhanced in accordance with the Northumbria River Basin Management Plan;
 - Policy WWE5 (Disposal of foul water) - connection to the public sewer is the preferred approach;
 - Policy WWE6 (Waste management) – minimise of waste production and the re-use and recovery of waste materials will be supported;
 - Policy ST2 (Local road network) - development proposals should have no adverse impact on the Local Road Network and safe and adequate access, egresses and internal circulation should be provided;
 - Policy ST3 (Development and transport) - provides various criteria for new developments, including that they are expected to provide safe and convenient access for all road users, incorporate pedestrian and cycle routes and include vehicle and cycle parking; and
 - Policy ID1 (Delivering infrastructure) - development will be expected to provide, or contribute towards, the provision of measures to directly mitigate its impact and make it acceptable in planning terms.
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