

**International Advanced
Manufacturing Park Area Action Plan
(IAMP AAP) Post Adoption Statement
Sustainability Appraisal Report
November 2017**

1. Introduction

The International Advanced Manufacturing Park Area Action Plan (IAMP AAP) was adopted on 30th November 2017.

The IAMP AAP is accompanied by a Sustainability Appraisal (SA) Report which incorporates requirements for a Strategic Environmental Assessment (SEA). This combined assessment appraises the social, economic and environmental effects of implementing the Local Plan, and reasonable alternatives, with the purpose of promoting the objectives of sustainable development and ensuring their integration within the Local Plan. South Tyneside and Sunderland City Council, as the body's which prepares and adopts the Local Plan Document (IAMP AAP), is classified as the 'Responsible Authority' under the SEA Regulations and prepared the SA.

SA is required by the Planning and Compulsory Purchase Act 2004 which requires consideration of sustainability effects for all emerging Development Plan Documents. In addition to this, the European Directive 2001/42/EC (often known as the SEA Directive), requires the preparation of an environmental report that considers the significant environmental effects of a plan or programme. This Directive is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633 (The SEA Regulations).

The SEA Regulations (Regulation 16) specify that 'as soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall...bring to the attention of the public...a statement containing the following particulars.

- a) how environmental considerations have been integrated into the plan or programme;
- b) how the environmental report has been taken into account;
- c) how opinions expressed in response to—
 - i) the invitation referred to in regulation 13(2)(d);
 - ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
- e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- f) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

This information is presented in the following sections:

- Section 2 - How have sustainability and in particular, environmental considerations been integrated into the IAMP AAP;
- Section 3 - How the environmental report has been taken into account;

- Section 4 - How the SA and Consultation Representations have been taken into account;
- Section 5 - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives; and
- Section 6 - Measures that are to be taken to monitor the Significant Environmental Impacts of the Implementation of the Plan.

2. How have sustainability, and in particular, environmental considerations been integrated into the IAMP AAP

The preparation of the Sustainability Appraisal is an iterative process and is an integral part of preparing the AAP. Due to the need to consider environmental impacts as part of the SA, this process also incorporated a Strategic Environmental Assessment (SEA).

A Sustainability Appraisal aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies or plans promote sustainable development, and to recommend improvements to the policies within the plan to deliver more sustainable outcomes. Strategic Environmental Assessment aims to predict and assess the environmental effects that are likely to arise from plans. It is a process for assessing and mitigating the adverse environmental impacts of specific plans and policies.

The Council's published a number of versions of its SA report during the preparation of the AAP, which also helped to inform changes to the plan to improve its sustainability and limit environmental impacts. Table 1 sets out the various SA reports which were published alongside the SA.

Stage	Report	Date
Stage 1	Scoping Report	September 2015
Stage 2	SA Report - Publication Draft	August 2016
	SA Post Publication Draft Consultation Addendum (Submission Version)	February 2017
	SA Addendum of Proposed Post Examination Modifications (Main Modifications)	September 2017

Stage 1 Scoping Report

As required by the relevant regulatory requirements, the process commenced with the production of an SA Scoping Report. The Scoping Report was prepared with input from a SA steering group which included officers responsible for a range of functions from both South Tyneside and Sunderland City Councils. The report sets out the methodology that was to be followed for the SA. Due to the cross boundary nature of the AAP, the SA objectives used were based on those being used by each of the respective authorities in the SA's of their emerging Local Plans.

In accordance with the SEA Regulations, the reports also outlined the contents and main objectives of relevant plans and programmes and summarised available baseline information and the characteristics of the area. The Scoping Report also presented the proposed framework for the appraisal and the objectives contained within this framework covered each of the issues that the SEA Regulations state must be addressed by an Environmental Report.

The draft SA Scoping Report for the IAMP APP was circulated to the three statutory consultation bodies as set out in regulation 12(5) and 12(6) of the Environmental Assessment of Plans and Programmes Regulations 2004:

- Environment Agency;
- Historic England; and
- Natural England.

The above bodies were consulted on the draft SA Scoping Report between 28th September 2015 and 2nd November 2015.

Stage 2 SA Report

Various iterations of the SA Report were produced and consulted on, including assessments of modifications to the Plan recommended before and after the examination in public.

SA Report - Publication Draft	This Report was subject to public consultation alongside the Publication Draft IAMP AAP (PSD1) between 8 th August and 26 th September 2016, and subsequently extended to 10 th October 2016. This was prepared to fully assess the publication version of the Plan and provided a comprehensive assessment of the draft AAP, including consideration of reasonable alternatives for strategic policy issues.
SA Post Publication Draft Consultation Addendum (Submission Version)	This addendum to the SA was prepared to reflect the proposed modifications (PSD6) to the AAP at the time of submission and to also respond to representations made during the consultation. This SA Addendum complements but does not supersede the Publication Draft IAMP AAP SA Report (August 2016).
SA Addendum of Proposed Post Examination Modifications (Main Modifications)	This addendum built upon previous SA work undertaken for the IAMP AAP and was underpinned by the same SA Framework set out within the Publication Draft IAMP AAP SA Report (August 2016). The addendum assessed the impact of the proposed Main Modifications to the Plan. The addendum was therefore subject to public consultation between 18 th September and 2 nd October 2017.

Each of these documents outline the findings of the assessment of effects; gives consideration of reasonable alternatives; and include details of mitigation measures to reduce predicted adverse effects and provides measures to increase beneficial effects. Recommendations are made as to which reasonable alternatives are preferred in sustainability terms and how proposed policies could be improved.

In accordance with relevant guidance on SA, the appraisal considered the effects of the policies in the emerging plan against the SA Framework set out in the Scoping Report. The assessment was designed to primarily meet the requirements of the SEA Regulations and included considering the effects of the policies in the plan in terms of the scale of the effect and the sensitivity of the resource that would be affected, whether the effects are

temporary or permanent, positive or negative, direct or indirect and whether there is potential for secondary, synergistic or cumulative effects to accrue. As required by the SEA Regulations, the SA also suggested mitigation measures to prevent, reduce and, as fully as possible, offset any significant adverse effects of implementing the Plan.

3. How the environmental report has been taken into account

The SA must be an integral part of producing the Plan being appraised. As outlined in Section 2, the AAP has evolved and been influenced by several stages of consultation and accompanied by an assessment of likely economic, social and environment effects on the Plan.

The SA identified relevant sustainability objectives for the IAMP and provided an objective assessment of the likely significant effects of the policies in the AAP. At each stage the SA recommends a series of mitigation measures to reduce or avoid the potential adverse effects and maximise the potential beneficial effects arising from the implementation of the Plan and these changes have been incorporated into the adopted Plan.

The SA has informed the selection of preferred options through an objective appraisal of a range of reasonable options and alternatives against the framework of sustainability objectives. Before submission of the Plan for examination, and during the examination, the SA was also used to screen proposed changes and Main Modifications to ensure that they did not affect overall SA outcomes or would have likely positive effects against economic, social and environmental objectives.

The sustainability appraisal has identified a range of significant effects which are considered likely to arise from the IAMP AAP. In most cases these have been effectively mitigated through the drafting of the AAP policies.

In a small number of cases (around greenhouse gas emissions and climate change adaptation) early iterations of the Sustainability Appraisal concluded that there was potential to do more to deliver sustainability objectives. The policies included within the AAP have been revised to address these.

4. How the SA and Consultation Representations have been taken into account

As outlined in Section 2, the AAP has evolved and been influenced by several stages of consultation. The SEA Directive requires that the opinions expressed by consultees are taken into account during the preparation of the plan before its adoption. Consultation is therefore an important aspect of plan making and SA.

The AAP has been informed by four stages of consultation where representations were invited:

- Issues and Options (Regulation 18). This ran from the 23rd February to 27th March 2015.
- Green Belt and Site Selection Options (Regulation 18). This ran from the 9th December 2015 to 3rd February 2016.
- Publication Draft (Regulation 19). This ran from the 8th of August to 26th September 2016 and subsequently extended to the 10th October.
- Main Modifications. This ran from 18th September 2017 until 31st October 2017.

The Sustainability Appraisal has accompanied each stage of the plan-making process and been subject to consultation. The outcomes of these consultations have been reported in Consultation Statements which includes a summary of the main issues raised and how the Plan has addressed these.

In regards to the SA Scoping Report, Statutory consultation was undertaken between 28th September 2015 and 2nd November 2015. A copy of the consultation invitation is provided in Appendix C of PSD10. A response was received from each of the consultation bodies (Appendix A, PSD5), and each recommended some minor amendments to the methodology set out in the draft Scoping Report. As required by the SEA Regulations, statutory consultees were consulted on the scope and content of the Scoping Report for a period of five weeks. The recommended changes, and action taken in response, are set out in Table 2 of PSD10.

SA Report (Updated) (August 2016) (PSD2) was subject to public consultation alongside the Publication Draft IAMP AAP (PSD1). Representations were invited between 8th August 2016 and 26th September 2016 and then further extended for another 2 weeks until 10th October 2016. The consultation period was extended, as it came to the Councils' attention that some consultees had not received a letter. Therefore the Councils extended the consultation by 2 weeks and sent letters to these particular consultees, allowing them a full six week period in which to respond.

In total, 39 representations were received from a range of stakeholders, such as local residents, land owners, statutory consultees, community groups, local authorities and scheme promoters, pursuant to Regulation 20 of the 2012 Regulations. Copies of these representations can be found within the Report of Representations (PSD8). The main issues raised are set out within the Schedule of Representations (PSD9). Three responses specifically referred to the SA Report. These were from Historic England, Natural England, and Durham Bird Club, and are included in Appendix A of PSD5.

The Addendum to the Main Modifications was consulted on from 18th September to 31st October 2017. No specific comments were received in response to the SA of the Main Modifications.

5. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives

The process of preparing the Plan is itself one that involves the consideration of issues and options. Consideration of alternatives as required by the SEA Regulations has therefore been an integral part of that process. The reason for developing and selecting the strategy and policies have been outlined in previous SA Reports and detailed in the Compliance Statement (PSD10) pages 59-63.

The Issues and Options Consultation (SD1) invited views and preferences on a range of key issues, options and alternatives. This included where the IAMP should be located and its proposed scale. This took into account research completed on the capacity and suitability of major employment sites and Enterprise Zones across the North East region, which assisted in identifying that the broad location to the north of Nissan within Sunderland and South Tyneside as being the most suitable and sustainable location. This consultation also set out three potential locations in the Sunderland-South Tyneside area and sought views on whether these areas could be the most appropriate to meet the requirements of the IAMP.

Further more detailed alternative options were introduced through a consultation on the Green Belt Site Selection Options Paper (SD4) which was consulted upon between 9th December 2015 and 3rd February 2016. This consultation considered the scale of the 'commercial demand', the requirements for safeguarded land to meet future needs and the need to allow for ecological mitigation. This led to the development of three spatially different options. The spatial nature of these options was also informed by on site constraints such as flood risk, the River Don, existing ecology (which would need to remain) and existing utilities.

This consultation and SA formed the bases of the AAP policy framework to prescribe what land uses are appropriate where, and ensure that any impacts could be mitigated. This led to the AAP boundary to include land for development, land to be safeguarded and land to remain in the Green Belt and to be considered for potential ecological mitigation. The SA at this stage also assessed the alternative options on the grounds of their sustainability and the most sustainable option was taken forward as the preferred option.

Taking into account the outcomes of the SA and the representations received in response to the Green Belt and Site Selection Options, the Council published the Publication Draft IAMP AAP for consultation between 8th August 2016 and 26th September 2016. This consultation was then further extended for another 2 weeks until 10th October 2016. Alongside the AAP the SA Report – Publication Draft (PSD2) was published for consultation. The SA Report set out how the Council had considered the reasonable alternative strategies and scored each of the policies in the plan against the agreed Sustainability Objectives. Through this process the Council's were able to refine the policies to ensure that they were based on sound sustainability principles.

Following the SA and Green Belt and Site Selection Options consultation, it was concluded that Option 1 was the most preferable, but that positive elements from Options 2 and 3 were also incorporated into producing the preferred option, including the location of the 'Hub' so that it could be accessed by employees on existing sites and new employees at

the IAMP, and the location of the safeguarded land was moved to the west to maintain a larger expanse of Green Belt land north-south.

In addition, the proposed Objectives for IAMP were refined, including the addition of a specific environmental objective relating to flood alleviation, water quality and habitat protection to reflect the assessment of impacts arising from a new crossing of the River Don.

The SA also identified potential significant effects. Policies within the AAP were therefore prepared to help mitigate against these significant effects. Table 8 of the SA Report (Updated) (PSD2) sets out mitigation measures put in place through the AAP and also identifies potential for further mitigation.

Subsequent to the consultation on the IAMP AAP – Publication Draft (PSD1), the Council's proposed a number of further modifications to improve the AAP and address some of the concerns raised during the consultation process. The Council therefore prepared the IAMP AAP – Publication Draft incorporating Proposed further Modifications (PSD7) and submitted this to the Planning Inspectorate in advance of the Examination in Public Hearing sessions. Alongside the revised AAP, the Council's also published a SA – Post Publication Draft Consultation Addendum (PSD5) which considered the potential impact of the proposed changes on the SA and SEA objectives. The addendum also directly responded to responses received in relation to the consultation on the SA.

In total there were three consultation responses which were received which made reference to the SA. These were from Historic England, Natural England and Durham Bird Club. A further response from Sport England was also noted as being relevant to the SA process and findings. Amendments to the plan were made to address the concerns raised, as set out in Section 3 of the Addendum (PSD5) and subsequent to these amendments to the AAP and the assessment contained within the SA Addendum, both Historic England and Sport England signed Statements of Common Ground which formally withdrew their objections.

Following the close of the Examination Hearings, a number of further Main Modifications were proposed to the AAP. Consultation on these proposed Main Modifications took place between 18th September to 31st October 2017. A further SA addendum was prepared to consider the impact of the proposed Main Modifications against the SA and SEA objectives. As a result of the SA process revisions were made to several proposed Main Modifications to address identified significant adverse effects. As a result, the SA addendum identified that the proposed Main Modifications would only have significant positive impacts against the SA and SEA objectives.

Measures that are to be taken to monitor the Significant Environmental Impacts of the Implementation of the Plan

The SEA Directive requires the monitoring of significant environmental effects resulting from the implementation of the IAMP AAP. The AAP includes a Monitoring Framework in Appendix B, which also includes a table showing which of the policies in the AAP are aligned to each of the Sustainability and SEA objectives.

These will be reported on in detail via the Authority Monitoring Reports for both South Tyneside and Sunderland City Council. Monitoring is required to ensure that the approach set out in the Plan continues to be relevant and effective. Regular monitoring will include analysis of data and trends and reviews of the evidence base and provides the basis to trigger a review of actions, strategies and policies to reflect changing circumstances. These will be incorporated into subsequent reviews of the Plan.