

4 PLANNING POLICY CONTEXT

4.1 PORT OF FELIXSTOWE

1. The planning policy context within which the Felixstowe South Reconfiguration proposals need to be considered is derived from legislation, directives, statements and guidance notes, which have been formulated, reviewed and updated at European, national regional and local level over a number of years.

2. In accordance with EIA Directive 85/337/EEC (as amended by Directive 97/11/EC) the construction of “port installations” are described as having the potential to give rise to significant effects on the environment by virtue of such factors as nature size and location.

3. In assessing the need for the development and the merits of this proposal against potential alternative solutions, relevant considerations include:

- The Government’s strategy at national level for sustainable development, transport and ports as set out in white papers (and daughter papers) and planning policy guidance notes (PPGs);
- Strategic planning and economic policy as described in existing and emerging regional economic and transport strategy and regional planning guidance; and,
- Development plan policy as contained at the county structure plan and local plan level and in economic development strategies, such as the Haven Gateway Partnership.

4.2 NATIONAL POLICY CONTEXT

1. In *A New Deal for Transport* (1998) the Government sets four aims for policy on ports. These are to:

- Promote UK and regional competitiveness by encouraging reliable, efficient distribution to markets;
- Enhance environmental and operational performance by encouraging the provision of access to markets by different forms of transport;
- Make the best use of existing infrastructure in preference to expansion, wherever practicable; and
- Promote best environmental standards in port design and operation, including where new development is justified.

2. Within the Government’s strategy for sustainable development, PPG13 ‘Transport’ takes forward the Government’s agenda for an integrated transport strategy (as originally set out in its 1998 White Paper. It places an increased emphasis on sustainable development and the need for integration of different modes, including the transfer of freight transport to shipping where possible.

3. Ports are recognised as being important to sustainable distribution. In PPG13 local authorities are encouraged to promote the role of ports by encouraging access to

them by rail and road and to avoid “developments which are incompatible with any nearby port operations”.

4. *Sustainable Distribution* (March 1999) and *British Shipping* (November 2000), further daughter papers to the Transport White Paper, set out a lucid analysis of the importance to the nation of an efficient and sustainable distribution system and recognise that “better utilisation of railways, ports and shipping services has a vital role to play in building a sustainable distribution system” (*Sustainable Distribution* paragraph 5.19) and “shipping is an important and integral part of Britain’s industry and trade...Policies for it fall not only within the broader transport policy, but also, as within other industrial sectors of the economy, under the umbrella of the Government’s wider economic and industrial aims...These have many components, within a central objective of achieving high and stable level of growth and employment.” (*British Shipping*, paragraph 956).

5. National Policy on Ports is encapsulated within the Government’s ports policy *Modern Ports: A UK Policy* (November 2000). This daughter paper to the Transport White Paper highlights the economic role of ports and the contribution that shipping makes to sustainable transport. The overriding theme is that operators themselves should be responsible for the location and scale of port development within the statutory guidelines of the planning process and this should be reflected within the strategic planning policy.

6. A key objective of port policy is to maintain a balanced policy on port development which aims to make best use of existing and former operational land, secures high environmental standards, but supports sustainable projects for which there is a clear need (paragraph 1.2.2). “The UK economy depends upon international trade...Ports serve the national interest supporting the competitiveness of national and regional economies...The UK’s economy needs a thriving ports industry...It is in the national interest that our ports remain able to handle current UK trade and its development efficiently and sustainability. They must succeed not only to meet the immediate demands of their customers, but also to invest in new facilities, in safety and to safeguard communities and the environment” (paragraph 1.1.2, 1.2.1, 1.2.3). “If the port industry fails to meet demand or is prevented from doing so, shipping lanes may divert primary service to overseas ports” (paragraph 1.1.6). “Some ports may need to increase capacity to meet future demand. Where there is clear need, we will support sustainable port projects, but each case must be looked at on its merits” (paragraph 2.4.7). Port developments should be demonstrably commercially viable (paragraph 2.4.25) and “there is a presumption in favour of making the best use of existing infrastructure where possible”.

7. In April 2003 the Department of Transport published A Project Appraisal Framework for Ports, fulfilling the commitment to develop an appraisal framework for ports given in *Modern Ports: A UK Policy* (November 2000). Five headline objectives are identified by the Government and which are to be used in assessing all transport investment that requires some form of official approval (paragraph 3.1). These are: safety; economy; environment; accessibility; integration; and further considerations.

8. In the context of the Government’s key objective of making the best use of transport infrastructure, it is suggested that promoters should consider alternatives at sites they control that increase the productivity of existing quays, natural or dredged

channels, and operational land and buildings and landside links (paragraph 3.15). Assessments should investigate the trade off between increased uses of existing infrastructure and other factors in the appraisal framework, including the environment and safety.

9. The Government's economic policy objective for transport is that development should contribute to an efficient economy and support sustainable economic growth in appropriate locations (paragraph 4.11). *"Ports have a vital role in supporting and enhancing the competitiveness of the national and regional economies. The efficient handling of the UK's international and domestic sea borne trade and passenger is an important consideration the case for port developments. Efficient ports may also attract transshipment traffic, which enhances value added and local employment prospects income and employment for the local area. Efficiency in this context does not just have to mean lowest costs, but the best mix of cost and quality for service to serve the need of the customer"*.

4.3 STRATEGIC AND REGIONAL PLANNING GUIDANCE

1. Regional Planning Guidance for East Anglia (RPG6) and Regional Planning Guidance for the South East (RPG9) provide the most up-to-date regional planning guidance for the East of England.

2. RPG 6 (November 2000) covers East Anglia (Suffolk, Norfolk and Cambridgeshire) and advocates growth in the Cambridge Corridor. It identifies the area focussed on Ipswich as one of the parts of East Anglia with the greatest economic potential whose strengths include the 'internationally important' Port of Felixstowe. In line with this, Policy 15 emphasises the need to maximise the potential of the Ipswich Urban area to develop further as one of the most economically dynamic parts of the region.

3. The Guidance specifically addresses the development of ports in the Region and recognises (paragraph 6.23) that their maintenance and improvement is essential to maintaining and improving the region's economy. The Guidance reiterates the need to maximise the use of existing ports and transport infrastructure wherever possible and suggests that the potential for the continued development of the Port of Felixstowe and associated services for rail freight should be considered in the context of the regional transport strategy. The Port of Felixstowe is identified as a 'Key Transport Corridor For the Region'.

4. RPG 9 (March 2001) covers Essex, Hertfordshire and Bedfordshire. The Guidance suggests (Policy T6) that an effective freight distribution system is vital to the UK and seeks to promote a fully integrated freight distribution system, which makes the most efficient and effective use of road, rail, inland waterways and coastal shipping. Policy T7 states *"The sustainable development of seaports and port facilities (including road and rail access to them) should be supported for international deep-sea, short-sea and coastal shipping"*.

5. Regional Planning Guidance for the East of England will eventually supersede the current suite of regional policy documents. A consultation document was issued in September 2002 entitled 'Consultation Options Leading to Regional Planning Guidance for the East of England' (RPG 14) identifies a need to build on the opportunities offered

by the East of England's proximity to the European mainland and the major sea and air transport gateways to Europe and the rest of the world. Within the document the Haven Gateway, which includes Felixstowe and Harwich, is proposed as a possible sub-region, which offers potential for economic growth. The document acknowledges that the Haven Ports (Ipswich, Felixstowe and Harwich) are emerging as key economic drivers in this part of the region. A partnership (the Haven Gateway Partnership) of local authorities and private sector investors including launched in May 2001 to maximise economic and regeneration opportunities in the sub region.

4.3.1 Suffolk Structure Plan (June 2001)

1. The Suffolk Structure Plan was adopted in June 2001 and covers the period 2001 to 2016. An objective of the Plan is to minimise the environmental impact of freight movement by favouring the use of rail and shipping.
2. The Plan recognises (paragraph 8.63) the strategic importance of the Port of Felixstowe to the county's transport infrastructure and, as Britain's leading deep-sea port, to the national and local economies. Proposals to maintain or expand the Port, within the development area authorised by the Felixstowe Dock Act 1988 will be acceptable where they do not conflict with residential amenity or the transport and environmental policies in the Plan (Policy T15).

4.3.2 Suffolk Coastal Local Plan

1. The Suffolk Coastal Local Plan was adopted in February 2001 and covers the period to 2006. The Plan acknowledges that the development of Felixstowe Port is provided for by Acts of Parliament (principally the Felixstowe Dock and Railway Acts), which give powers to the Felixstowe Dock and Railway Company to develop land within a specified area for port related development, without the need for planning permission. This area is referred to here as the 'Dock Acts boundary'.
2. Felixstowe South is located within the Dock Acts boundary and as such, the potential for B1, B2 and B8 uses is recognised by the Council under Policy AP173. New commercial development on any significant scale will be considered on a comprehensive basis, in the context of adjacent development and access to the primary route network.
3. Land to the north west of the site, within the Dock Acts boundary is located within an 'Area of Outstanding Natural Beauty' (AONB). Policy AP12 (AP172-Felixstowe Port) confirms that the Local Authority will oppose any third port access route and any development, other than that permitted to implement the provisions of the Felixstowe Dock and Railway Act 1988 (including its associated legal agreements), in this AONB.
4. Land to the north west of the site, outside the Dock Acts boundary is defined as Heritage Coast. To the South, adjoining boundary of Felixstowe South is Landguard Fort, which is allocated as a 'Listed Building' and as a 'Scheduled Ancient Monument'. The implications of these allocations are described under 'Site Specific Polices', below.
5. A Review of the Local Plan has commenced and an Issues Paper was published in Autumn 2003. Hutchison Ports (UK) Limited submitted representations to the Issues

Paper, to request that the proposals for Felixstowe South are supported in the Local Plan review.

4.3.3 Conclusion

1. The development of new port facilities at Felixstowe that utilise existing infrastructure is supported at the regional, strategic and local planning policy levels in both existing and emerging strategy, subject to environmental safeguards. These environmental safeguards are the subjects of other sections of the statement.

2. The proposal will meet a requirement for modern, efficient deepwater container handling capacity in the UK for which there is a pressing need. The new deepwater facility will contribute to meeting the forecasted continuing strong growth in container traffic volume in the UK. It will provide sustainable new capacity and be capable of handling the very large vessels (which taking an increasingly share of the deep-sea container trade) and serve as a transshipment hub port for the broader North European markets.

4.4 SPECIFIC POLICIES

1. There is a considerable amount of policy guidance relating to, economic development, the historic environment, archaeology and coastal planning that are also relevant to HPUK's proposals. This policy guidance is reviewed below and addressed in more detail in the relevant sections of this Statement:

2. The policy matrix (Table 4.4.1) assesses the conformity of the development proposals against the current Suffolk Coastal Local Plan policy in light of the separate impacts assessed in the Felixstowe South Environmental Statement. Overall the outcome of this assessment is that the development proposals would generally have a beneficial or neutral impact on the policies that have been considered.

4.4.1 Air quality

1. Policy relating to air quality in the UK is set within the Air Quality Strategy (AQS). The AQS was introduced in 1997 under Part IV of the Environmental Act, 1995, and a revised version was published in January 2000.

2. The objective in the revised AQS were set with regard to recommendation from the Government's Expert Panel on Air Quality Standards (EPAQS), and were implemented under the Air Quality Regulations, 2000.

3. In summary, the AQS established health-based standards for eight key pollutants across the UK, and sets objectives to achieving these. It also provides the framework for a system of Local Air Quality Management (LAQM). Under this system, local authorities are required to review current and predicted air quality in their locality, and to designate Air Quality Management Areas (AQMA) if any of the national objectives are unlikely to be met.

4. Part I of the Environmental Protection Act, 1990 establishes two pollution control systems: local air pollution control (LAPC) and integrated pollution control (IPC). These systems will be superseded by a single pollution prevention and control (PPC) regime

implementing EC Directive 96/61. PPC will be phased in over the period to 2004, and will generally result in an extension of permitting to a wider range of activities.

4.4.2 Archaeology/built heritage

17. Guidance on the protection of archaeological resources within the planning system is set out in PPG16: Archeologically and Planning, 1990. Archaeological resources are subject to various levels of protection; the most important are often designated as Scheduled Ancient Monuments whilst local plans can designate Archaeological Priority Areas or their equivalent.

2. A building, which is listed, such as Landguard Fort may also be a scheduled monument, though the provisions of the Ancient Monuments and Archaeological Areas Act 1979 take precedence over the Planning (Listed Buildings and Conservation Areas) Act 1990 and, therefore, listed building controls do not apply.

3. The site of a monument includes any adjoining land that may be considered important to the monument's conservation. It is against the law to:

- Damage a scheduled monument by carrying out works without consent;
- Cause reckless or deliberate damage to a scheduled monument; and
- Use a metal detector or remove an object found with one without a licence from English Heritage.

4. Protection of archaeology is largely a matter of adopting 'best practicable means', prior to and during construction of a development, in order to identify and evaluate relevant resources and to carry out appropriate mitigation by recording or removal.

4.4.3 Coastal planning

1. Guidance on policy in relation to coastal planning is set out in PPG20: Coastal Planning, 1992. In summary, this guidance defines the role of the planning system in coastal locations to be "*reconciling development requirements with the need to protect, conserve and, where appropriate, improve the landscape, environmental quality, wildlife habitats and recreational opportunities of the coast*". It iterates the needs of major development proposals on the coast to be determined in accordance with development plan policies unless there are material considerations, which indicate otherwise. Proposed developments of national or regional importance that require a coastal location will normally be included in structure plans.

2. The PPG notes that projects, such as reclaiming land from the sea, require an environmental impact assessment. Local Authorities are also encouraged to ensure that policies for the coast in neighbouring areas are consistent. The PPGs point out that piecemeal reclamation of intertidal areas and other developments may damage and erode nature conservation areas (paragraph 4.3).

3. Local authorities in consultation with the Countryside Agency define Heritage Coasts. This is not a statutory designation, but is intended to provide a management

tool for balancing the requirements for conservation and access to the coastal zone in the areas that they define as such.

4.4.4 Drainage

1. Surface waters are subject to a range of protective instruments and classifications. They are classified under the General Quality Assessment (GQA) systems, ranging from A (Good) to F (Bad), whilst their ecological status is defined under the RIVERS ecosystems Classification, ranging from RE1 (very Good) to RE5 (Poor). The Environment Agency regulates the management of surface water through a series of water quality objectives (under Section 83 of the Water Resources Act 1991) and a regime of abstractions and discharge licenses.

4.4.5 Ecology

1. Habitats and wildlife are afforded varying degrees of protection within the planning system. Areas of nature conservation interest are variously designated as SSSI's, Nature Reserves or, at a county or district level, as County Wildlife Site or equivalent.

2. Rare or endangered species are listed under Schedule 5 and 13 of the Wildlife and Countryside Act 1981. Areas of importance for migratory or breeding birds may be designated as Ramsar Sites or Special Protection Areas in accordance with the Conservation (Natural Habitats &c.) Regulations 1994.

4.4.6 Ground contamination

1. The identification and remediation of ground contamination is governed by a range of policies and procedures, such as PPG23: Planning and Pollution Control 1994, the Control of Substances Hazardous to Health (COSHH) Regulations 1994, and the Construction (Design and Management) Regulations 1994. The protection of soil and groundwater from contamination is primarily the responsibility of the Environment Agency.

2. Ground waters are classified as Major, Minor or Non-aquifers, reflecting their existing or potential importance for water abstraction purposes. Areas around abstraction points (Sources) are classified as Source Protection Zones 1 (Inner), 2 (Outer) or 3 (Catchments). The Waste Disposal Authority regulates the licensing and management of waste disposal, including potentially contaminated spoil.

4.4.7 Landscape and views

1. Landscape character is protected at several levels within the planning system. The most important areas at a national level are designated as National Parks or AONBs, whilst areas of distinctive character at a county or district level may be designated as Special Landscape Areas (SLAs) or equivalent.

2. Significant vegetation may be protected by Tree Preservation Orders, or may be designated as Ancient Woodland or Important Hedgerows, whilst historic landscapes are often identified as Registered Parks or Gardens. Visual amenity is not protected

explicitly within the planning system, although individual views may be recognised within development plans and can be material consideration in development control.

4.4.8 Light pollution

1. Policy AP97 of the adopted Local Plan seeks to minimise light pollution arising from development likely to require external lighting. Applicants for planning permission should demonstrate that the proposed lighting scheme is the minimum required for security, working purposes; there will be no glare of light spillage onto highways which would affect motorists; and that any glare and light spillage is kept to a minimum.

4.4.9 Noise and vibration

1. PPG24: Planning and Noise, 1994, provides guidance on minimising the adverse impact of noise, including the segregation of noise-sensitive and noise-generating uses through the application of noise exposure classes. Noise prediction methods were set up on two British Standards: BS5228 (a series published between 1994 and 1992) – Noise control on construction and open sites; and BS4142 (BSI, 1997a) – Method of rating industrial noise affecting mixed residential and industrial areas).

2. Noise nuisance is generally regulated under the Environmental Protection Act 1991, and construction noise specifically under Sections 60 and 61 of the Control of Pollution Act 1974.

4.4.10 Socio-economics

1. PPG4: Industrial and Commercial Development of Small Firms 1992, provides guidance on the location of industrial development, including the need for environmental protection.

4.4.11 Social inclusion

1. One of the Government's key objectives for sustainable development is social progress, which recognises the needs of everyone. PPG12 emphasises the need for local planning authorities to consider the relationship of planning proposals to social needs and problems, including their likely impact on different groups in the population. In addition, it states that social considerations will be relevant in looking at measures for crime prevention.

2. Circular 5/94, Planning Out Crime 1994, provides guidance to local authorities, developers and designers about planning considerations relating to crime prevention and highlights the need for developers to adopt designs for new developments, which take the security of people and property fully into account. These principles are reflected in the development proposals.

4.4.12 Transportation

1. Transport has been a particular focus of Government policy in recent years. The two prevailing policy instruments are the Transport White Paper and PPG13.

2. The Transport White Paper *A New Deal for Transport* (DETR, 1998) sets out the Government's commitment to creating a more integrated transport system and to extending transport choice in a manner that encourages sustainable development. These objectives are to be implemented through the development of regional transport strategies and local transport plans.
3. The key objectives of the White Paper include:
 - Providing more transport choice, specifically in relation to non-car modes;
 - Developing more integrated, more reliable and higher quality public transport;
 - Managing streets so as to give greater priority to pedestrians, cyclists and public transport;
 - Improving the management and more efficient use of trunk roads; and
 - Promoting the preparation of travel plans and supporting specific developments.
4. Transport 2010, the Government's 10-year investment plan for transport, was published in July 2000, and reflects the aim of the White Paper. This stresses that the role of partnership and shared responsibility between the private sector and local government. The document also sets a target for an 80% growth in rail freight by 2010.
5. The Strategic Rail Authority (SRA) is responsible for delivering the Government's targets for rail transport. In May 2001, the SRA published its Freight Strategy to provide a framework for delivering a modal shift from road to rail. The SRA aims to facilitate this growth by developing an Interchange Strategy to promote the development of new and enhanced facilities at ports and inland terminals.
6. PPG13: Transport (March 2001) provides guidance on the integration of transport and land use planning, with the aim of promoting sustainable transport choice, encouraging accessibility by non-car modes and reducing the need to travel, especially by car. It also set out requirements for preparing transport assessments and travel plans in support of major development applications. Travel plans are required to adopt a multi-modal approach to promote sustainable development patterns, of which parking restraint is regarded as an essential component.
7. Local authorities are encouraged to promote opportunities for freight generating development to be served by rail and to identify and where appropriate protect sites and routes, which could be critical in developing infrastructure for the movement of freight. The Guidance acknowledges that in relation to rail use, this should be done in liaison with the SRA.
8. Further details are provided in the Transport Assessment that accompanies this ES.

4.4.13 Heritage and conservation

1. Guidance on the protection of archaeological resources within the planning system is set out in PPG16: Archeologically and Planning, 1990. Archaeological resources are subject to various levels of protection; the most important are often designated as Scheduled Ancient Monuments (SAMs) whilst local plans can designate Archaeological Priority Areas or their equivalent.

2. A building which is listed, such as Landguard Fort, may also be a scheduled monument though the provisions of the Ancient Monuments and Archaeological Areas Act 1979. This takes precedence over the Planning (Listed Buildings and Conservation Areas) Act 1990 and therefore, listed building controls do not apply.

3. The site of a monument includes any adjoining land that may be considered important to the monuments conservation. It is against the law to:

- Damage a scheduled monument by carrying out works without consent;
- Cause reckless or deliberate damage; and
- Use a metal detector or remove an object found with one without a licence from English Heritage.

4. Protection of archaeology is largely a matter of adopting 'best practicable means', prior to and during construction, in order to identify and evaluate relevant resources and to carry out appropriate mitigation by recording or removal.

Table 4.4.1 Policy matrix

Policy	Title	Effects of scheme	Comments
The Environmental Context			
AP1	Conservation Areas – Control of Development and Enhancement	Neutral	The site is not within a Conservation Area. However, HPUK have been involved in extensive discussions with Suffolk County Council, Suffolk Coastal District Council, English Heritage and the Landguard Forum to develop an appropriate design response on the southern boundary of the Port balanced with the operational constraints of the Port itself. This ES concludes that the development will have a negligible to moderate adverse residual impact on the setting of settlements and the Harwich and Felixstowe Conservation Areas, depending on view point.
AP6	Preservation of Listed Buildings	Neutral	The development does not include works to a Listed Building
AP7	Development of Archaeological Sites	Neutral	An assessment of the impact of the development on Land Based and Marine based archaeology (including the Landguard Peninsula Scheduled Ancient Monument) has been carried out as part of this ES and mitigation proposed where appropriate.
AP10	Management Plans	Neutral	The Suffolk Coast and Heath Management Plan is considered in Section 16.1.4 of the ES
AP12	Area of Outstanding Natural Beauty	Neutral	The development is not located within the AONB, but this ES assesses the impact of the development on the Area and concludes that it would be of negligible significance.
AP13	Special Landscape Areas	Neutral	The development is not located within the SPA, but this ES assesses the impact of the development on the Area and concludes that it would be of minor adverse significance.
AP14	Wildlife and Habitats	Neutral	This ES assess the impact of the development on marine ecology, marine and coastal ornithology and coastal and terrestrial ecology and conclude that it would have only minor effects
AP15	Designated Areas and Habitats	Beneficial	The ES assesses the impact of development on the marine ecology, marine and coastal ornithology and coastal and terrestrial ecology and concludes that it would have only minor effects. However, the ES also concludes (Section 2) that the proposed development represents a major means of providing the deepwater container handling capacity that is required by the UK economy

Design			
AP19	Design	Neutral	HPUK have been involved in extensive discussions with Suffolk County Council, Suffolk Coastal District Council, English Heritage and the Landguard Forum to develop an appropriate design response on the southern boundary of the Port balanced with the operational constraints of the Port itself.
AP20	Design for people with disabilities	Beneficial	The development will provide disabled access in accordance with the requirements of the Disability Discrimination Act 1995
Housing			
AP39	Residential Amenity	Neutral	The impact of the development on noise, vibration, air quality, landscape and visual environment, traffic and transportation the local community and socio economics are considered in this ES.
Employment, Retail and Agriculture			
AP46	New Employment Uses	Beneficial	Once operational, the development will provide an estimated 621 FTE direct jobs. Further jobs will be generated across the Haven gateway as a whole. The environmental impacts of the development are assessed elsewhere in this ES.
AP48	Expansion of Existing Units	Beneficial	The development will result in the expansion of an existing employment use. The environmental impacts of the development are assessed elsewhere in this ES.
AP51	General Employment Areas	Beneficial	The development meets the relevant considerations of this policy.
AP54	Warehousing and Storage	Beneficial	The development meets the relevant considerations of this policy.
AP66	Tourism	Beneficial	The activities of the Port and viewing area will add to the range of tourist attractions, which the District can offer.
Transport and Communications			
AP80	Car Parking Standards	Beneficial	The Transport Assessment provides justification for the proposed level of car parking provision
AP81	Cycling Routes	Neutral	This ES concludes that measures to mitigate any potential effects on pedestrians and cyclists are not considered necessary.
AP82	Provision for Cyclists	Neutral	Measures to mitigate any potential effects on pedestrians and cyclists are not considered necessary.
AP83	Provision of Pedestrians	Neutral	This ES concludes that measures to mitigate any potential effects on pedestrians and cyclists are not considered necessary.
AP84	Rail Services	Beneficial	The development includes the construction of a new rail freight terminal.

AP85	Bus Services	Beneficial	It is proposed that improved infrastructure will be provided in the vicinity of Landguard Fort, including an arrivals and bus turning area. The issue of Section 106 Agreements and planning obligations is a matter, which is under separate discussion.
AP86	Interchange Facilities	Beneficial	The development includes a water - rail freight interchange facility.
Facilities, Services and Utilities			
AP90	Overhead Power Lines and Electricity Supply Lines	Beneficial	The power supply to the proposed development will be provided by an underground route within the Port estate.
AP91	Hazardous Development	Neutral	The environmental impacts of the scheme are considered in the ES.
AP92	Areas at Risk of Flooding	Beneficial	This ES considers the impact of the development on the standard of flood defence and concludes that overall the proposed development would result in an increased standard of flood defence at the Port of Felixstowe.
AP93	Sewage Disposal	Neutral	Foul drainage will be discharged into a gravity pumped sewage system that will be connected to the existing Anglian Water main.
AP94	Surface Water and Aquifer Protection	Neutral	The impact of the development on water quality is assessed in this ES.
AP95	Coastal Instability	Neutral	A detailed assessment of the potential impacts of the development on the coastline has been undertaken as part of this ES
AP96	Sea Defence	Beneficial	This ES considers the impact of the development on the standard of flood defence and concludes that overall the proposed development would result in an increased standard of flood defence at the Port of Felixstowe.
AP97	Light Pollution	Beneficial	This is a criteria based policy, the requirements of which this scheme complies. This ES concludes that the significance of the impact of the lighting included in the development ranges from minor adverse to major beneficial depending on viewpoint.
Recreation			
AP107	Footpaths and Bridleways	Neutral	The development will have no long term impact on a public footpath or bridleway.
Implementation			
AP117	Planning Obligations	Neutral	The issue of Section 106 Agreements and planning obligations is a matter which is under separate discussion
Felixstowe Peninsula			
AP173	Felixstowe: Felixstowe Port Development	Beneficial	The development meets the relevant considerations of this policy
AP187	Felixstowe: Improvements to Industrial Areas	Beneficial	Landscaping and good design concepts have been incorporated to mitigate the impacts of the scheme

AP206	Felixstowe: Landguard Fort	Beneficial	This is a criteria based policy, the provisions of which are met by the development scheme. This ES considers the environmental impacts of the development and mitigation is proposed where appropriate.
AP207	Felixstowe: Land around and adjacent to Landguard Fort	Beneficial	This is a criteria based policy, the provisions of which are met by the development. This ES considers the environmental impacts of the development and mitigation is proposed where appropriate.

4.5 SUSTAINABILITY ASSESSMENT

4.5.1 National sustainability context

1. The Government commitment to the principles of sustainable development is set out in '*A Better Quality of Life, a Strategy for Sustainable Development in the UK*'. The Strategy is based on four broad objectives:

- Maintenance of high and stable levels of economic growth and employment;
- Social progress, which recognises the needs of everyone;
- Effective protection of the environment; and,
- Prudent use of natural resources.

2. The Strategy also sets out ten principles and approaches that reflect key sustainable development themes. Some of these are particularly relevant to planning:

- Putting people at the centre;
- Taking a long-term perspective;
- Taking account of costs and benefits;
- Creating an open and supportive economic system;
- Combating poverty and social exclusion;
- Respecting environmental limits;
- The precautionary principle;
- Using scientific knowledge;
- Transparency, information, participation and access to justice; and
- Making the polluter pay.

4.5.2 Sustainable development and planning

1. Planning Policy Guidance sets out the Government approach to taking account of sustainable development in planning. Of particular relevance are:

- PPG1 – General Policy and Principles; and
- PPG12 – Development Plans.

2. PPG1 states that sustainable development seeks to deliver the objective of achieving, now and in the future, economic development to secure higher living standards while protecting and enhancing the environment. To deliver sustainable outcomes, planning should:

- Provide for the nation's needs for commercial and industrial development, food production, minerals extraction, new homes and other buildings, by respecting environmental objectives;
- Use already developed areas in the most efficient way, by making the most attractive places in which to live and work;

- Conserve both cultural heritage and natural resources (including wildlife, landscape, water, soil and air quality), taking particular care to safeguard designations of national and international importance; and
- Shape new development patterns in a way, which minimises the need to travel.

3. PPG12 sets out how sustainable development considerations can be addressed in Local Plans. It provides a range of more detailed objectives, key actions and commitments in a series of indicators to help measure progress towards sustainable development. These have been taken into account as part of the Felixstowe South Reconfiguration proposals.

4. At regional level, sustainable development frameworks (prepared under the UK Strategy) set out a vision for sustainable development in each region, and a region's contribution to sustainable development at the national level. A wide range of stakeholders, including Regional Chambers, Regional Development Agencies, Local Government and the Voluntary Sector, agree them. They define sustainable development objectives and set out priorities using regional indicators and targets. The East of England Sustainable Development Framework (October 2001), prepared by the East of England Regional Assembly, informs and guides regional guidance and development plans in the East of England region. The overall aim is to improve the quality of life for all the people in the region. The East of England's Framework identifies the following high level objectives for the region:

- To achieve sustainable levels of prosperity and economic growth.
- To deliver more sustainable patterns of location of development, including employment and housing.
- To protect and maintain our most valuable regional assets such as designated habitats, landscapes of natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and management.
- To reduce our consumption of fossil fuels.
- To achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region.
- To use natural resources, both finite and renewable, as efficiently as possible, and reuse finite resources or recycled alternatives wherever possible.
- To minimise our production of by-products or wastes, aiming for 'closed systems' where possible.
- To avoid using the global environment to underwrite our own sustainable way of life (e.g. dependence on unsustainably produced and/or transported food imports or timber).
- To revitalise town centres to promote a return to sustainable urban living.

5. At local level, the Joint Local Planning Authorities (Ipswich and St Edmundsbury Borough Councils, Suffolk Coastal, Babergh, Forest Heath, Mid Suffolk and Waveney District Councils and Suffolk County Council) have produced a series of documents, including *Suffolk's Environment: towards sustainable development*, *Guidance on the Scope of Development Plan*, and *A Methodology for the Sustainability Appraisal of*

Development Plans: Objectives Policies and Proposals, drawing upon national and regional objectives to provide a context for the local planning authorities to progress towards planning for sustainable development. The first of these three publications was reviewed in December 2002 and sets the out objectives and key challenges for Suffolk's environment.

4.5.3 Implications of the proposed development for sustainability objectives

1. This section assesses the scheme in light of the key sustainability objectives and challenges, which have been identified in *Suffolk's Environment: Five-Year Review* December 2003 (prepared by the Suffolk Local Planning Authority).
2. Table 4.5.1 presents the above sustainable development objectives and challenges for a number of topic areas. The predicted implications of the proposed development for the topics and their objectives and challenges are described in the final column of the table. An indication of whether the proposed development contributes towards or conflicts with the objectives is provided; this assessment is based on the information presented throughout the ES and its supporting documents.
3. In summary it can be seen that the development contributes towards achieving the Suffolk County Council's sustainability objectives, particularly those in relation to brownfield development, employment opportunities, transport and tourism/recreation.

Table 4.5.1 Overview of the predicted effects of the proposed development in relation to the Joint Local Planning Authorities objectives for sustainable development (Ipswich and St Edmundsbury Borough Councils; Suffolk Coastal, Babergh, Forest Heath, Mid Suffolk and Waveney District Councils and Suffolk County Council)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To Plan to meet housing requirements of the whole community providing housing opportunities and choice, including a mix in the size, type and tenure of housing in sustainable locations		
Housing	<ul style="list-style-type: none"> • Accommodating population growth and housing demand within a balanced community • Appropriate geographical distribution of new housing development • Improving design quality • Housing the workforce within a balanced community, minimising the need for out-commuting • To maximise the use of previously developed land • Maximise the use of land • Maximise energy conservation and efficiency 	The proposed development does not affect this objective, either positively or negatively
To maximise the development potential of vacant, underused and derelict land and buildings minimising the loss to Greenfield land.		
Brownfield Development	<ul style="list-style-type: none"> • Maximising opportunities for accommodating population growth whilst retaining employment opportunities within a balanced community • Optimising the use of land whilst retaining the amenity and ecological values of the site • Housing the workforce within a balanced community and minimising the need for out-commuting • To maximise the use of previously developed land 	The proposed development makes use of previously developed port land.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To achieve sustainable levels of prosperity and economic growth through the establishment, maintenance and expansion of employment use.		
Employment	<ul style="list-style-type: none"> • To have equitable access to employment opportunities across the County • To develop employment uses in accessible locations • To accommodate economic growth whilst preventing or, at least, minimising detrimental environmental impacts • To maintain levels of economic prosperity and encourage an appropriate level of economic • To encourage economic development minimising depletion of natural resources 	The proposed development will clearly contribute towards each of these objectives through the provision of direct and indirect employment in the area and enhancing economic activity within the region.
To protect and enhance the quality and local distinctiveness of Suffolk's landscape		
Landscape	<ul style="list-style-type: none"> • To educate and raise awareness of Suffolk's landscape value and quality • Conserving and enhancing the visual, cultural and historic values and distinctiveness • To maximise and appreciate, the economic benefits arising from the distinctive 'Suffolk landscape' • To retain and enhance the distinctiveness of Suffolk's landscape 	Mitigation by design has been incorporated to minimise the impact of the development on the surrounding landscape.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To protect and enhance biodiversity throughout the County		
Biodiversity	<ul style="list-style-type: none"> • To educate and raise awareness of global and local implications of the loss of biodiversity • Conserving and enhancing biodiversity • To appreciate the real economic value of biodiversity • To protect habitats through minimising pollution and development encroachment and fragmentation 	This ES assesses the impact of the development on marine ecology, marine and coastal ornithology, and terrestrial ecology and concludes that it would only have minor effects.
To protect designated areas of the historic environment		
Conservation Areas & Listed Buildings	<ul style="list-style-type: none"> • To protect the historic built environment for future generations as a cultural and environmental asset • Improving design quality in harmony with historic settings • To take account of the historic assets • To balance the objectives of conservation with economic growth 	Mitigation by design has been incorporated to minimise the impact of the development on the historic environment and in particular the Landguard Peninsula Scheduled Ancient Monument.
To protect the County's archaeological interests		
Archaeology	<ul style="list-style-type: none"> • To protect the archaeological resource for future generations as an educational asset. • To ensure that archaeological excavations are done in an environmental sensitive manner • To take the economic capital of archaeology into account • To protect the finite and irreplaceable archaeological resources 	A main consideration with this development is the impact on the setting of the Landguard Peninsula Scheduled Ancient Monument. Mitigation has been by design particularly in respect of the approach and proposals incorporated to enhance the attractiveness of the Landguard Peninsula and Fort as a tourist attraction.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To protect and improve the attraction, efficiency, vitality and functions of town centres offering a range of community, shopping and employment opportunities		
Town Centres	<ul style="list-style-type: none"> • Encouraging people to live, work and socialise in towns • Opportunities for all to access a broad range of services • Maintain and enhance the visual and cultural attractiveness of town centres as places to live, work, and enjoy • Maintain and develop an efficient, competitive and innovative retail and entertainment centre • Facilitate modern patterns growth in centres • Optimise use of land in town centres and minimise inappropriate out town expansion 	The proposed development would contribute towards these objectives through the provision of direct and indirect employment in the area and enhancing economic activity within the region.
To protect and enhance the quality and local distinctiveness of the built environment		
Design	<ul style="list-style-type: none"> • To improve appreciation of good design • Retain and enhance the local character and distinctness of Suffolk's towns and villages • To encourage integration of all, component parts within new/existing development • To accommodate economic growth in high quality surroundings • Maximising use made of development land 	HPUK have been involved in extensive discussions with key stakeholders to develop an appropriate design response on the southern boundary of the Port balanced with the operational considerations of the Port itself.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To reduce both crime and the fear of crime		
Crime	<ul style="list-style-type: none"> • Providing for a range of cultural and social needs to further community integration and strengthens social fabric • Develop further partnership working with police, communities and developers • Minimising opportunities for crime through design, layout and components of development • Minimising socio-economic costs associate with crime • Producing attractive, well managed environments in a resource and energy efficient manner 	Circular 5/94 'Planning Out Crime' provides guidance to local authorities, developers and designers about planning considerations relating to crime prevention and highlights the need for developers to adopt designs for new developments, which take the security of people an property fully into account. These principles are reflected in the development proposals.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To promote and provide for walking, cycling, park and ride and public transport use as alternative modes of travel and reduce the need to rely on private motor vehicle		
Transport	<ul style="list-style-type: none"> • To discourage the use of private vehicles by prioritising other modes • To raise awareness of the implications of using unsustainable forms of transport • To minimise environmental pollution from transport • To encourage economic development with sustainable development transport provision • To understand the real economic cost of transport • To reduce the consumption of non-renewable resources • To minimise the need for land take for road building/widening 	The proposal comprises the development of a water-rail freight transport interchange and is consistent with Government guidance on transport.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To locate new development and protect existing services, so as to minimise growth in the length and number of motorised journeys and to maximise use of public transport and other alternatives to the use of private motor vehicles		
Accessibility	<ul style="list-style-type: none"> • Equity of access • To raise awareness of the implications for unsustainable forms of transport • Reduce inequalities of health, wealth and welfare • To retain accessible key facilities to reduce the need for multiple journeys • To encourage integration of transport facilities within new and existing developments • Encourage economic growth in sustainable patterns • To retain a mix of uses and maximise use of land within settlements 	The proposal comprises the development of a water-rail freight transport interchange and is consistent with Government guidance on transport.
To Maintain and enhance the range, quality and accessibility of facilities for formal and informal recreation		
Open Space and Recreation	<ul style="list-style-type: none"> • To fully appreciate the health and well-being benefits of formal and informal recreation • Promoting social inclusion through equality of access • Positively contributing to the built up fabric of towns and villages and making these areas more attractive places for people to choose to live • Recognising the economic value of recreation • Maximising use of land for recreational space and being able to reflect changing needs/demands 	The activities of the Port and viewing area would add to the range of tourist attractions within the District.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To maintain and enhance the range, quality and accessibility of facilities for formal and informal recreation		
Countryside Recreation	<ul style="list-style-type: none"> • Ensuring access to countryside recreation facilities is available to all • Ensuring that sites can be accessed easily through non-car means • Ensuring that facilities at informal recreation sites are maintained and improved • Ensuring that sufficient sites are located within short distances of centres of population 	The activities of the Port and viewing area would add to the range of tourist attractions within the District.
To promote and enable the use of renewable energy sources, and energy consumption		
Renewable Energy	<ul style="list-style-type: none"> • Increasing awareness and interest in sustainable lifestyles • To minimise pollution from energy generation • To encourage the development of renewable energy • To maximise the use of renewable resources 	The scheme has been designed in accordance with an objective to achieve energy efficiency in design. There would be no effect on renewable energy objectives.

Table 4.5.1 (cont)

Topic	Sustainable Development Challenges	Predicted Effect of the Proposed Development
To conserve mineral resources in order to meet the long term requirements and ensure restoration to a standard suitable for specific beneficial after use		
Minerals	<ul style="list-style-type: none"> To ensure the provision of materials to meet present and future needs To conserve sufficient minerals for future generations To minimise pollution to air, land and water from mineral extraction To optimise economic opportunities whilst protecting the environment 	There will be no affect on this objective.
To promote and enable best practice on waste management, minimising waste through encouraging the reuse, recycling and recovery of waste		
Waste Management	<ul style="list-style-type: none"> To dispose of waste with minimum risk to human health for present and future generations To dispose of waste while minimising pollution to the environment To identify the true economic cost of waste To minimise materials requiring waste disposal 	Where possible, proposals for the beneficial use of dredged material have been sought and would be implemented
To promote and enable best practice on waste management, minimising waste through encouraging the reuse, recycling and recovery of waste		
Waste Management: Water	<ul style="list-style-type: none"> Accommodating new housing and industry in areas safe from flooding Ensuring the increasing demands for water do not comprise waste quality Ensuring that Brownfield redevelopment is not hindering unnecessarily by flooding concerns Ensuring that the demand for water does not exceed the supply 	The proposed development does not affect this objective.

PART II:

ASSESSMENT OF POTENTIAL EFFECTS AND ENVIRONMENTAL IMPACTS ASSOCIATED WITH THE PROPOSED RECONFIGURATION

This Part comprises the following:

Section 5	Hydrodynamic and sedimentary regime
Section 6	Marine ecology
Section 7	Marine and coastal ornithology
Section 8	Coastal and terrestrial ecology
Section 9	Sediment quality
Section 10	Water quality
Section 11	Fisheries and fishing activity
Section 12	Traffic and transportation
Section 13	Noise
Section 14	Vibration
Section 15	Air quality
Section 16	Landscape and visual environment
Section 17	Land-based archaeology and cultural heritage
Section 18	Marine archaeology
Section 19	Local community
Section 20	Land drainage, flood and coastal defence
Section 21	Commercial and recreational navigation
Section 22	Socio-economics
Section 23	Summary of potential impacts and mitigation measures associated with the proposed development
Section 24	Monitoring proposals
Section 25	In-combination effects

PART II ASSESSMENT OF POTENTIAL EFFECTS AND ENVIRONMENTAL IMPACTS ASSOCIATED WITH THE PROPOSED RECONFIGURATION

1. Part II describes the nature of the existing environment with respect to each relevant environmental parameter in turn and identifies and assesses the significance of the potential effects of the scheme on this baseline.

2. The methodology adopted for the impact assessment is described in Section 1.5.1. However, for the identification of the effects of the proposed development on the hydrodynamic and sedimentary regime, it is not considered to be appropriate to assign levels of significance to the effects. This is because the influence of the proposals on the hydrodynamic regime causes 'changes' to arise rather than 'impacts', that can be defined in terms of their magnitude, spatial extent, etc, to directly occur. Therefore, the effect of the proposed development on the hydrodynamic and sedimentary regime has been simply described and, in many cases, quantified based on the outputs of the numerical modelling. For example, the effect of the development on peak current speeds and direction on the flood and ebb tide has been quantified, as has the effect on sedimentation rate in the Harbour area and the changes to wave heights over intertidal areas under a range of wind conditions. The effect of the development on coastal processes throughout the Harbour is also described.

2. Having described the predicted effects on the hydrodynamic and sedimentary regime, the implications for other environmental parameters, namely marine ecology, marine and coastal ornithology, coastal ecology, sediment and water quality, fisheries, marine archaeology and land drainage, flood and coastal defence is then assessed following the methodology described in Section 1.5.1. For example, the implications of changes in tidal currents, wave height and sedimentation rate for estuarine habitats and the species that these habitats support is considered and associated with an impact significance. In addition, the predicted physical effects have implications for flood and coastal defences in the Harbour and lower estuaries, which has been assessed.