



Respecting the past, shaping the future

Background

The Suffolk Preservation Society (SPS) is the County Branch for the Campaign to Protect Rural England, with a membership of around 2,000. It has receipt of the Consultation Document on the Draft Ports National Policy Statement, and requests that the following representations are taken into account and the Society kept informed as a stakeholder, as part of the ongoing Policy process.

Representations from the Society on the Ports National Policy Statement

1. The Society's submission is defined by its commitment to sustainable development that protects the special landscapes and historic settlements of the county of Suffolk. The port of Felixstowe is of national economic importance but this strategic significance must be set against its special qualities as a historic town; with the local economy benefitting significantly from its attractive environment and allied tourism industry. The port forms part of the Haven Gateway initiative, a key regional economic driver within Suffolk. It is important that growth within this area is carefully considered to yield economic development that respects the special qualities of the area's landscapes and historic towns and villages.
2. In particular, cross county transport links need to be carefully considered to balance the requirements of port related development with the wider interests of the remainder of the County. The Society urges the Government to ensure that appropriate mechanisms are provided to secure the upgrading of the rail network identified in the two white Papers ('The Future of Rail' and the 'Future of Transport; a Network for 2030' (2004)). Specifically the Felixstowe Branch Line (FBL) must be dualled and generally upgraded as a matter of national significance to increase capacity. The SPS would summarise its comments on the draft Ports NPS as follows:

PROPOSED GROWTH OF PORTS

3. The SPS is concerned that the Ports NPS states that there is a compelling case for substantial additional port capacity over the next 20-30 years. The SPS queries the basis on which this case is asserted. It sets out the additional capacity which has already been provided in the last 3 years, in particular the Port of Felixstowe which has been granted a 50% increase in capacity, approved in 2006. The NPS does not attempt to quantify the scale of further growth, merely justifies an apparent limitless increase on the grounds of

competition, innovation, flexibility and resilience” (1.11.7) The SPS is alarmed by this declaration of uncontained growth, with no guidance on the justification or the phasing of development. The failure to define a set of prioritised, locations for development effectively means that the concerns of local communities are unlikely to be capable of outweighing the argument in favour of development.

SUSTAINABILITY

4. The NPS does not attempt to set out any mechanism for the allocation of port growth, but states that the market is best placed to decide. It states that port development must be responsive to changing commercial demands and the Government considers that the market is the best mechanism for achieving it. This is considered to represent a wholly unsustainable approach to development, which will have a potentially significant impact upon interests of acknowledged importance. The impact of port development on the natural and built environment is enormous and includes: climate change, flooding, pollution (water and air), biodiversity, landscape, and historic environment. The potential to cause significant harm to these interests are enormous. The NPS, with its failure to identify justified need and the geography of a national strategy, represents unlimited scope for damage for which no amount of mitigation will ameliorate.

GEOGRAPHICALLY UNDEFINED

5. The NPS states that the Government does not wish to dictate where port development should occur. In this way it fails to geographically define the location of future port developments, which exposes communities, landscapes and habitats to an enormous threat of significant infrastructure, with no realistic mechanism to assess local impacts or apportion infrastructure costs. Furthermore, it fails to provide a co-ordinated system which responds to existing road and rail networks, and other infrastructure such as energy generation and transmission. This lack of a co-ordinated approach represents a greater risk of harm to the environment including: pollution and congestion from increased road freight, destruction of wildlife habitats and the threat to designated countryside the abutting AONB to name but a few. The absence of a strategic approach to development means that the cumulative impacts of the development cannot be fully assessed against other more appropriate sites, but must be dealt with in isolation, relying merely upon mitigating measures to address some of the harm.

PROCESS

6. The NPS relies upon a process of mitigation to address any dis-benefits which may ensue from port development. There is no attempt to provide a systematic approach to the identification of sites or a timetable for the bringing forward of sites. The SPS fears that this approach will result in an ad-hoc approach that will rely upon mitigation of harm caused rather than a reasoned and rational assessment of sites and their constraints and opportunities.

STRUCTURE

7. The SPS considers that the structure of the NPS fails to clearly identify the difference between what is guidance and what is policy. The way in which the policy document is set out relies upon interpretation for developers and decision makers. The SPS considers that the document should be more specific if it is to be an effective policy tool.

TRANSPORT NETWORKS

8. The NPS pays insufficient regard to international and national transport networks and the up-grading programmes of the railways to accommodate the increased freight traffic. The growth of port development cannot be seen in isolation, but must be fully integrated with existing national policy. The NPS should be informed by the existing and proposed upgraded system of inland transport infrastructure that will allow benefits to be enjoyed by local economies. The proposed unregulated system will undoubtedly only give rise to negative externalities. If the economic benefits of port development are not to be outweighed by the consequential environmental damage, then a thorough, joined-up and co-ordinated process of site identification and assessment must be provided by national policy.

CONCLUSION

In summary, The SPS consider that the Ports NPS is a document which is not fit for purpose. It fails to define the need, quantity and phasing of additional port development, exposing the natural and built environment, together with its communities and economies to significant harm. As a policy document it sits outside of the established raft of existing national planning policy, resulting in a disjointed and uncoordinated market led approach that pays insufficient regard to the interests of the natural and built environment and the wider community.

The Suffolk Preservation Society successfully campaigning to protect the landscape and settlements of Suffolk from harmful development since 1929. We continuously strive to promote the special qualities of our beautiful county for the benefit of all by direct engagement with the planning process, design awards and themed guidance. Join us at www.suffolksociety.org