**REPRESENTATION BY THE KIRTON AND TRIMLEY COMMUNITY ACTION GROUP (KATCAG) TO THE SUFFOLK COASTAL FINAL DRAFT PLAN**

***KATCAG DOES WISH TO PARTICIPATE AT THE ORAL EXAMINATION AND WILL BE REPRESENTED BY ITS BARRISTER, PLANNING CONSULTANT OR INDIVIDUAL MEMBERS OF ITS STEERING GROUP***

**OBJECTIONS TO POLICY SCLP12.35 – LAND AT INNOCENCE FARM**

Introduction

1. Our key concern is that even on the 2018 Port Study’s approach, taking (i) existing land and (ii) existing sites in the pipeline, there is no need to allocate a site on the scale of Innocence farm, as there are already sufficient pipeline sites to meet the central scenario.
2. It is the submission of the Kirton and Trimley Community Action Group (“KATCAG”) that this Plan has failed to meet its legal and procedural requirements.
3. Also, we consider it unsound against each of the four “Soundness” criteria.
4. The sole evidence base for this Policy is the 2018 Port Study. We contend that this Study fails to provide credible justification for:
5. the allocation of any land for port related businesses and operations either with an existing employment allocation or without – let alone a greenfield site.
6. Innocence Farm being the only site suited to meet that need.
7. The Justification Annex to this submission explains the weaknesses inherent in the 2018 Port Study which we contend fatally undermine the Plan in respect of points 3(i) and 3(ii). This Annex contains further detailed submissions relevant to soundness, in particular, on the issue of justification.
8. What follows in this paper is an outline of our submissions on the following topics:
9. The duty to co-operate
10. The issue whether the plan is positively prepared;
11. Justification;
12. Effectiveness; and
13. Consistency with national policy.
14. **Duty to Cooperate**
15. The 2008 Study involved consultation with: Babergh D.C., Ipswich B.C., Mid Suffolk D.C., St Edmundsbury D.C., Forest Heath D.C., Colchester B.C., Tendring D.C., Huntingdonshire D.C. & Peterborough C.C. By contrast in the 2018 Study a single workshop was held involving only 14 entities, none from outside the local area – see Appendix 2 page 59.
16. Similarly, consultation with other LPAs has been minimal at the Plan stage as evidenced in the minutes of the Local Plan Working Group and the absence of other LPAs in the list of respondents to the First Draft. In our submission SCDC has paid no more than lip-service to its duty under the 2011 Localism Act to co-operate with other LPAs on strategic planning matters.
17. The Plan wholly fails to acknowledge the existence of some 184 Ha of land, with planning permission but not yet developed or operational, in neighbouring districts. We recognise the changed environment facing LPAs but submit that the selection of sites for these purposes is a matter of strategic significance, both regionally and nationally, and should not be left to a single LPA. The Plan fails to meet the requirements of the 2004 Act.
18. **Positively Prepared** –
19. We have identified significant weaknesses in the 2018 Port Study, which are highlighted in the Justification Annex. Consequently, Policy SCLP12.35 - upon which it depends - is itself deficient. In particular, there is no evidence of a strategic rationale for any aspect of the Policy. That lack of strategy stretches across a broad range of factors including the need for any land, the need for this site, the likely infrastructure costs, the impact on the road network not least the Orwell Bridge and the effect of pollution.
20. We note the following simply as fact. In the Issues & Options exercise in 2017 an “Agent” offered at Seven Hills 90ha. of land “**347 - Land north west of Walk Farm, Levington 90.2 Agent - Off-port distribution facilities.”**  No other site was offered with the “Off Port” description. Innocence Farm was offered for “Storage or Distribution.” The 2018 Port Study refers only to 22.5Ha.of this land as site 9 of the 10 identified. Para 5.2 said – “only two are being promoted for port-related uses.” (Christmas Yard & Innocence). Page 50 said – “Site (Felixstowe Road/Seven Hills) being promoted by landowner for business park uses.” Despite downplaying Seven Hills, the Bidwells Appraisal Matrix goes on to score it at 23 out of 30 – the same score as Innocence Farm. The SCDC Final Plan 2019 includes the 22.5Ha business park as SCLP12.20.
21. Apparently the identity of the “Agent” who made the submission remains a mystery to both the landowner at Seven Hills and his agent. As we see it, the public offer of the Seven Hills 90Ha site should have been very attractive given its easy access to the A14 & A12 and correspondingly low infrastructure costs, along with a location next to the holding area for Operation Stack, well away from any sensitive communities. Both the 2018 Study and the Final Local Plan were silent on this matter. Even after the business park allocation, the 67Ha remaining at Seven Hills would be an ideal location for off-port operations. We trust SCDC will reveal the back-story during the examination.
22. We also simply note that the text of SCLP12.35 refers at para 12.380 to use of the Innocence Farm site “…in exceptional circumstances…” for “…nationally significant infrastructure projects..”. This was mysterious until a recent leaflet revealed that Sizewell C are evaluating a Freight Management Facility (parking for 150 HGVs en route to Sizewell) with 9.1Ha at the Seven Hills site as Option 1 and 9Ha at Innocence Farm as Option 2. It is unclear to us why Sizewell C would even be considering Innocence Farm, given the relative attractiveness of the site at Seven Hills as outlined above.
23. **Justification**
24. It is here we believe SCLP12.35 to be at its weakest – the case is far from robust and credible. The attached paper shows how, in numerous ways, the 2018 Port Study, the sole rationale for the Policy, fails to establish a need for any more Port land at all, including Innocence Farm. Notable deficiencies focus on the assumptions regarding growth, market share, transhipment rates, road-rail splits, conversion to land requirements, Port efficiencies, empty v laden containers, site characteristics and HGV parking.
25. Most significantly, the Study itself undermines the 67Ha claimed in SCLP12.35 when the Executive Summary refers to an existing pipeline of over 67Ha. Added to that, the 2018 Port Study explicitly excluded lorry parking which now features prominently in SCLP: 12.35.
26. **Effectiveness**
27. Here again we consider SCLP12.35 to be seriously deficient. The Final Draft Plan identifies a Viability Report produced by Aspinall Verdi in January 2019 (the final document in Appendix L - a list of “Evidence Base Documents” – page 535). Strangely, given what it must have cost to produce, there is no mention of it anywhere else in the Plan. This Report makes clear that SCDC’s employment proposals, of which Innocence Farm forms the major part, are unviable (Report Executive Summary). Although, much of what would be needed to render the site suited to the activities intended is yet to be determined, site access for any purpose involving any significant movement of road / rail traffic, would not be viable.  It can be said, safely, that the cost of creating a road or rail access to Innocence Farm, in any circumstances, would not be viable financially and there is no evidence to suggest it would be permitted by Highways England or Network Rail. Even were it allowed, it is impossible to assess whether the necessary infrastructure could be provided, by whom and at what cost.
28. At face value, it would appear the landowner seeks only the allocation. There is no evidence that they, or any other party, is willing to invest either in the site itself or in the necessary infrastructure. A site at Innocence Farm has been on the market with Bidwells since 2015 with no takers. The over-riding objective would appear to be to achieve the allocation and worry about the rest later, trusting that the mere mention of “The Port” will sweep away all obstacles.
29. It would appear an Achieveability Test was carried out to identify ways of ‘Overcoming Constraints’ and the Local Plan then stated “*Previous Engineering Assessment concludes site can be satisfactorily developed’.*
30. SCDC appear to have copied this conclusion and used it to inform the Local Plan without testing the conclusion for themselves

**Iv Consistent With National Planning Policy**

1. There is no clear or convincing case to grant an employment allocation at this green-field site. Even the prime document under-pinning the proposal makes it clear that sufficient land is already in the pipe-line. There is no evidence of any detriment to the Port should this Policy be struck out. Were such a threat genuinely to exist, then the Port itself would take action. Consequently SCLP12.35. is not sustainable either by itself or in the context of the alternatives.
2. The Government is bearing down on pollution. Locating such a development close to local villages would fly in the face of such initiatives.
3. The site lies to the east of the A14, in close proximity to sites of outstanding natural beauty, which, so far, have been spared the relentless development afflicting so much of the Colneis peninsula.
4. The Consultation on the Draft Local Plan drew an unprecedented level of response from local communities opposing the Policy. It was a further blow to local democracy to hear the Council Planning lead observe that, ….”even if a million people had objected, it would have made no difference – SCDC had to follow central government’s mandate….” A video of the SCDC Full Council meeting of 3rd January 2019 which approved SCLP12.35 is on-line at:

<https://www.youtube.com/watch?v=LD203I5cZ1k&feature=youtu.be&fbclid=IwAR3-vW47iBx0T0BJZs5Js-gfKBctbb0lkTlaPuwBcZv2L4ugy6Wmtb53ASs>

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**THE JUSTIFICATION ANNEX**

**PORT STUDY 2018**

The Port Study 2018 underpins SCDC’s contention that justification exists for the so-called “High Case” (103.8Ha.) demand for Off-Port Land.

In the Final Draft Plan, as a response to local reaction, SCDC says it is prepared to seek an allocation of only 67 Ha. at Innocence Farm, representing the so-called “Central” case.

The 2018 Study then constitutes the sole evidence base for SCDC’s proposal.

1. **A “Central Case” v a “Most Likely Case”**

It is normal business practice to evaluate proposals starting with a “most likely” scenario which is then subject to sensitivity analysis. In the 2018 Study, however, the analysis sets out to establish a “Low” case and a “High” case. A “Central” case is then calculated as the simple average of the two extremes. Inevitably this will flex with variations in the two extremes, reflecting no actual degree of likelihood.

1. **Growth Forecasts**

2018 must represent the most challenging year for forecasters in the short-term, let alone over the period to 2036. The 2018 Study begins by showing a strong historic correlation between GDP and the volume of TEUs. Unlike the 2008 Study, the current paper does not explicitly set out its GDP forecasts in annual percentages but simply states that the Oxford Economics was the source.

Turning to TEU forecasts, crucially para 2.32 states that: *- “The UK GDP is further adapted to take into account local port and market conditions that Royal Haskoning DHV considers will have an impact on container throughput.”* The paper goes on to say at para 2.37 that*: “The Central and Low Cases assume a slowing of both GDP and volumes as the economy adjusts to Brexit in the short and medium term. This GDP slowdown has a knock -on impact on throughput activity at the Port of Felixstowe under the assumption that UK consumer demand for imported goods would reduce, ultimately impacting on both EU and non EU trade.”* Para 2.38 then says: *“The High Case assumes a positive impact from tailored trade agreements after Brexit.”* It would have been useful to see the respective annual growth figures for each scenario.It is worth looking at the overall growth in TEUs over the three scenarios. Para 2.39 says: *“Overall, these forecasts indicate that from a starting point of about 9.5 M TEU in 2014 UK throughput could increase to between 12.4 M TEU (Low Case), 13.6M TEU (Central Case) or 14.6 M TEU (High Case) by 2040.”*

In simple percentage terms these figures equate to TEU growth over the period ranging from 30% “Low” to 54% “High” creating a “Central” 43%. Compared with one another, the range would seem much less significant – the “High” being around 18% higher than the “Low” & only 7.3% higher than the derived “Central”. Over such a long time-frame and given the political and trade uncertainties, these would seem relatively small degrees of difference - an implication of spurious accuracy.

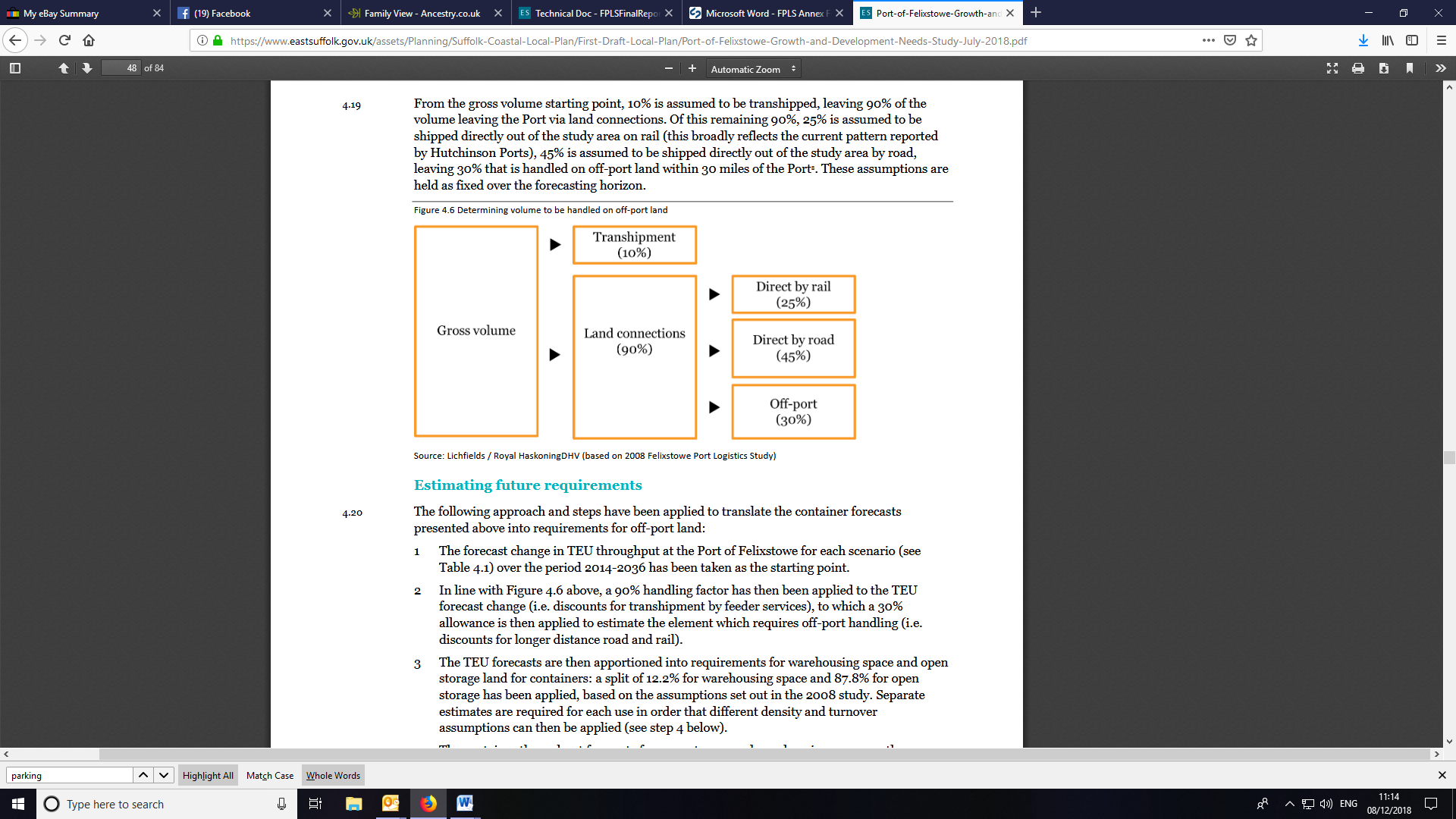
1. **Felixstowe’s Share of the UK TEU Trade**

Para 2.41 says that the assumption throughout the analysis is that Felixstowe will retain its market share. Para 4.3 re-states this: *“The Port’s market share of total UK TEU is assumed to remain at historical levels which have averaged about 39% of total TEU over the past 17 years.” By contrast para 4.11 reads: “In the Low Case, the arrival of Liverpool 2 is assumed to decrease Felixstowe’s market share as these two ports compete for container movements to the Golden Triangle. By contrast, Felixstowe’s market share is held constant in the Central and High Case scenarios (i.e. there is no assumed impact arising from Liverpool 2).”* This would seem to be an inconsistency. There should have been an explicit statement of the percentage loss of share in the “Low” case.

Naturally retaining market share at the historical average would be a base case but surely it would have been reasonable to undertake sensitivity analysis to establish the effect of Felixstowe losing various degrees of market share to the competition.

1. **Calculating The Need For Off-Port Storage**

Having derived Felixstowe’s share of the UK’s forecast TEU volumes, the 2018 Study then deploys, the following unchanged methodology drawn from the 2008 Study to establish the need for off-port storage:

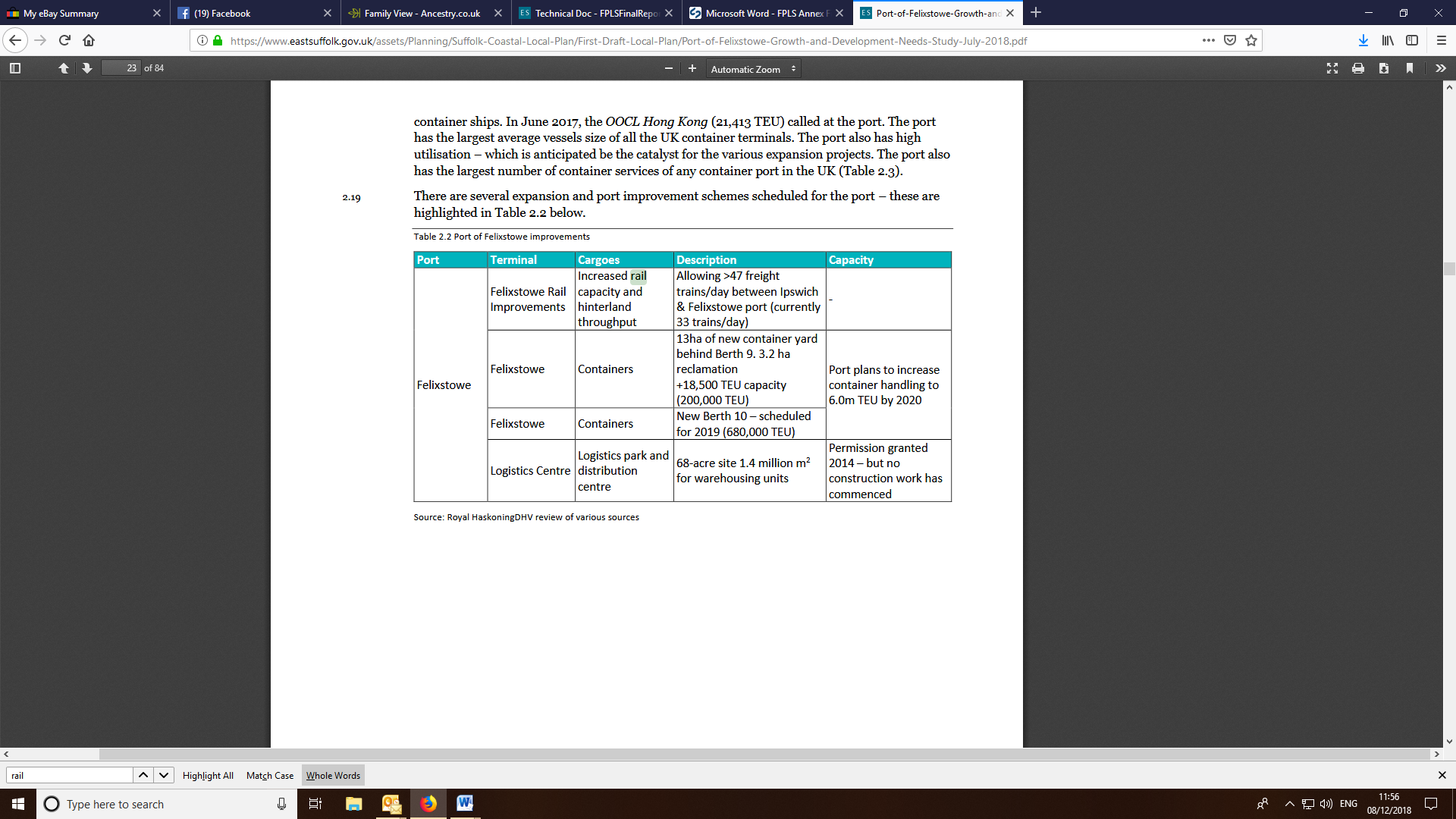


* 1. **Transhipment**

This is a crucial variable directly affecting the volume of TEUs to be handled by land connections. The value assumed, 10%, was established from pre-existing data in 2008. In the years since, the size of the biggest ships has almost doubled and the potential for transhipment would appear to have increased. It would have been reasonable not only to re-establish the validity of the 10% but also to carry out sensitivity analysis, particularly in view of the 2036 timescale.

* 1. **Rail**

The 2018 Study, in assuming 25% as the volume of land connection traffic to be carried by rail, is once again drawing on its predecessor. At para 1.17 it says: *“The terms of reference for this study do not require specific consideration of the implications of future growth at the Port of Felixstowe upon rail freight cargo capacity”.* Consequently, the Study does not reflect the 42% increase in rail capacity it later refers to in Table 2.19 below:



Logically, any increase in the percentage of TEUs carried by rail would reduce the percentage carried by road consequently reducing the need for off-port land. Excluding the effect of a major increase in rail capacity seriously undermines the conclusions of the 2018 Study.

1. **Converting Off-Port TEU Volumes to Land Requirements**
2. Taking the 30% of forecast Felixstowe TEU volumes assumed to require off-port handling, the 2018 Study then assumes the split between warehousing at 87.8% and open storage at 12.2%. The paper acknowledges this split is lifted from the 2008 Study. The 2008 Study conducted an in-depth analysis of the existing land supply at the time, which was within 30 miles of the Port, but the calculation leading to that precise split is not apparent. In any case, revisiting the analysis in 2018 would have been merited given the passage of time.
3. **Land Required For Container Storage & Warehousing**

**T**his is such a complex and specialist field, embracing technical parameters such as (i) “dwell times” – how long a container stays in one position (ii)“heights” – how tall containers are stacked, and (iii) “handling efficiency” for containers handled nearby and in port, that the 2008 Study established a model specifically to address the subject – see Annex D4.

By way of example, the then observed figures for container “dwell” were:

*“Current efficiency scenario*

*- Dwell times for current operations − 4.5 days on dock*

*− 14 days on dock (unladen)*

*- 30 days open container storage (laden)”*

The 2008 Study observed*: “The conclusion is therefore that the impact of altering dwell times at these facilities is significant, given the direct influence on capacity, and provides a large determinant in the model’s land demand output.”*

The 2008 Study also emphasized: *“Container storage density provides a tangible input into the model by setting the baseline for how many containers can be stored on a given area. In essence, the greater density that can be achieved the less land required.”*

Despite the major significance of these highly sensitive parameters in determining land requirements, the 2018 Study took the observed values from ten or more years earlier, applied them to the current day and over the Plan period to 2036. Para 4.20.4 reads*: “The container throughput forecasts for open storage and warehousing space are then converted into land requirements based on a ratio of 16,535 TEU per hectare/per annum for open storage and 1,045 TEU per hectare/per annum for warehousing (i.e. the number of TEU that one hectare of land can store during the course of a year). These densities are based on the assumptions set out in the 2008 study, and incorporate allowances for average container dwell times (30 days for open storage, 130 days for warehouses) used to determine the turnover of containers per year.”*

The 2018 Study also followed its predecessor in assigning a safety margin of 20% along with an additional 15% for “ancillary services” – the latter based on an analysis of observed land utilisation back in 2008. Para 4.20.5 reads: *”A 20% safety margin has then been added to the land requirement (similar to the approach generally adopted in employment land reviews for local plans), followed by a 15% allowance for ancillary facilities and operations such as mechanics, container repairs and haulage yards. No specific allowance has been made for lorry parking areas which are outside the scope of this assessment. These assumptions are consistent with the 2008 study.”*

Para 4.25 of the 2018 Study offers this caveat: *“As noted above, these future growth scenarios are highly dependent upon a range of macroeconomic drivers and trends – not least of which the impact of Brexit upon trade patterns with the UK – which are characterised by a great deal of uncertainty at the time of analysis. The resulting off-port land requirements also assume that current operational patterns continue in future, i.e. that the current proportion of container volume shipped directly out of the study area by rail and road does not change (in absence of evidence to suggest it will), although future changes could be influenced and instigated by changing preferences of shipping and cargo firms that use the port of Felixstowe.”*

As to operating and technological efficiencies within the Port since 2008 and over the Plan period to 2036, the 2018 Study notes at para 4.15 it has explicitly excluded any impact:

*“The 2008 Felixstowe Port Logistics Study assumed the impact of on port activities*

*would be held constant, and the same approach has been adopted in this study for consistency.*

*This means that it is assumed that the Port’s current operational practices as they relate to on-port operating efficiency (e.g. how quickly laden and empty containers are handled on the quay) and container dwell times (i.e. how long containers are stored at the Port) will broadly continue as currently. Furthermore, the use of land within the Port boundary ultimately reflects strategic choices by the operator about the layout and management of its estate. It is not within the scope of this study to investigate these factors in detail (in common with the 2008 assessment), and in any event, these choices will depend on market drivers and the needs of customers that will change over time.”*

That the situation is ever-changing is reflected in the minutes of a meeting in October 2018 of the Port Local Authority Liaison Committee (LALC) where Clemence Cheng, CEO) advised of a pending 13% increase in container storage capacity within the Port:

*“Work on the new container yard space behind Berth 9 continues apace, with the first two*

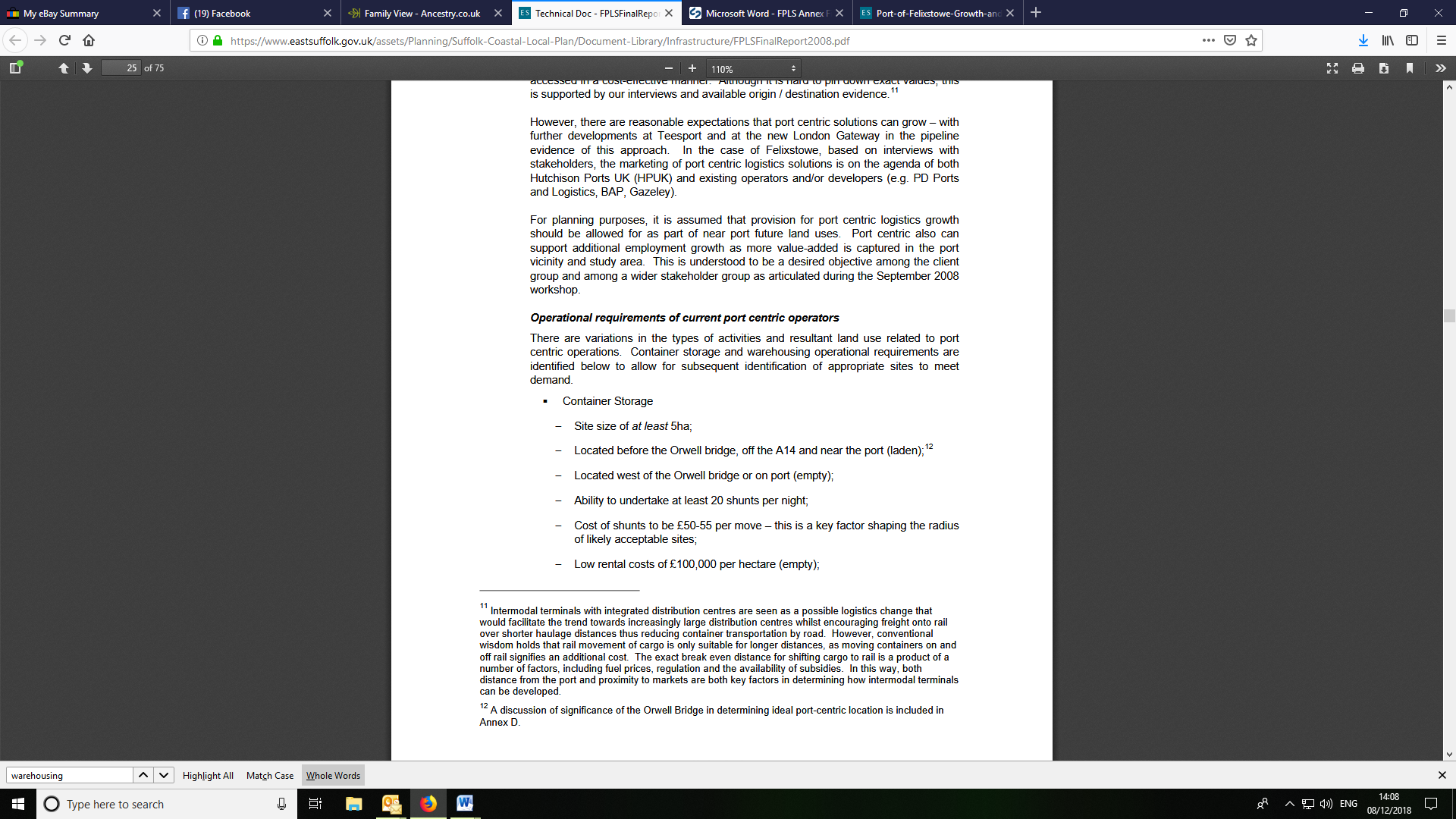
*blocks now handed over and fully operational. Completion of the new yard is scheduled*

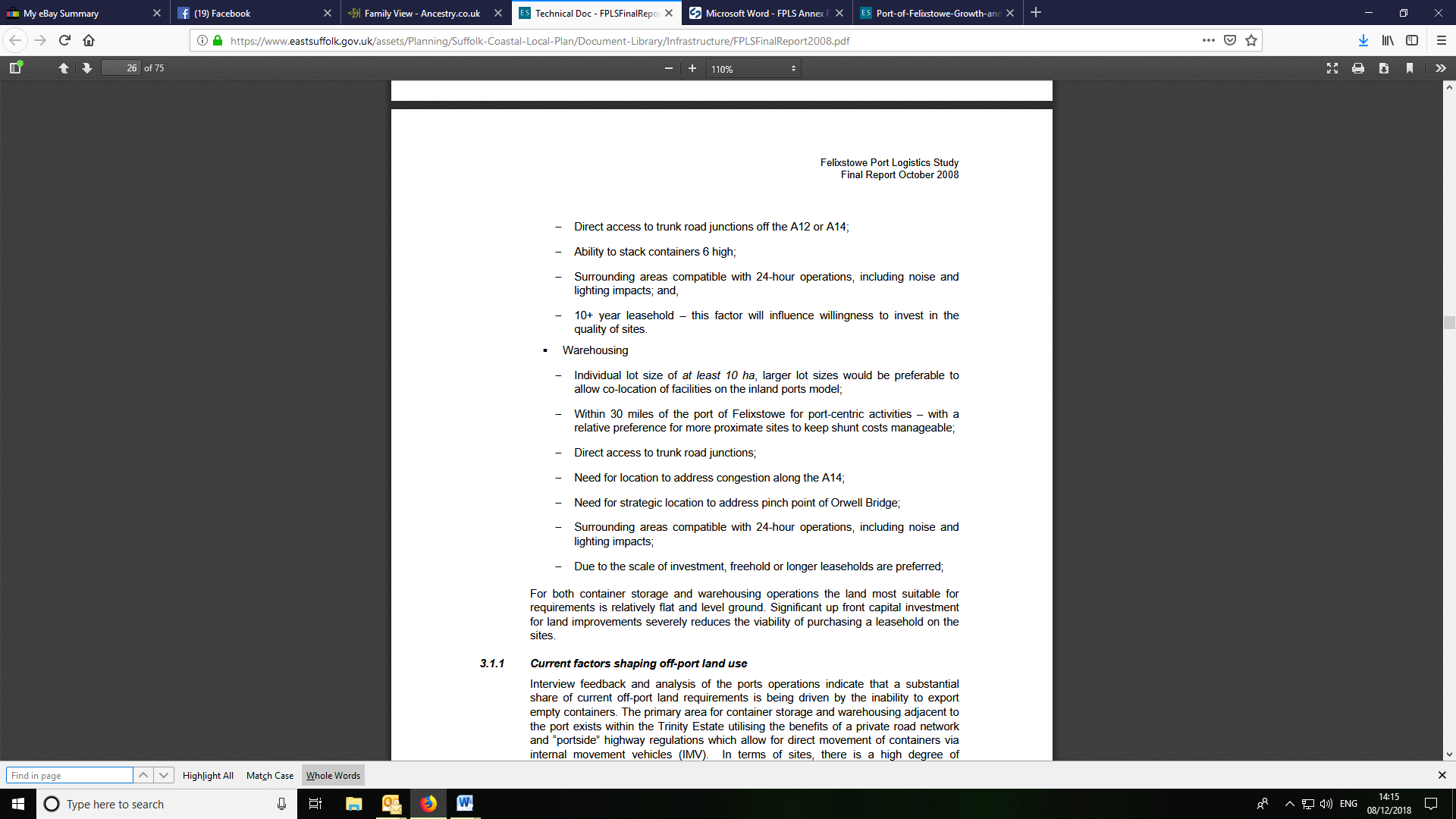
*for early 2019 and will add a further 18,000 TEU to the existing 130,000 TEU storage*

*capacity.”* This is an increase of almost 14% in on-port capacity.

1. **Site Characteristics**

The 2018 Study was silent on several parameters affecting site suitability. These include elements such as minimum size, shunt costs & capacities and differences as to whether containers are empty or laden. This is taken from the 2008 Study Pages 13 & 14:





Annex D of the 2008 Study went into great detail regarding shunt costs and distance related costs, none of which was revisited in 2018. It is worthy of note that the size minima fall well short of a development on the scale of Innocence Farm.

1. **Empty v Laden Containers**

In the 2008 Study this was an important consideration. Page 16 read as follows:

*“Over the planning period, it is assumed that the balance of laden and empty containers is stable. The basis of this assumption is that the major changes in the production and distribution of goods has occurred – recall in section 2 it was noted that the ratio of container traffic to imports in terms of value is around 1:1 suggesting that the rate at which imports replaces local goods is now tailing off as import penetration is maturing along with consumption growth.”*

The 2008 Study makes further reference to the possibility of other ports handling empty containers with a consequent reduction of demand for off-port land in the vicinity of Felixstowe – page 16 reads: *“There is an import and export of containers that needs to be balanced – the unloading of full containers from vessels at the port works hand in hand with the loading of laden and importantly empty containers bound for manufacturing regions in Asia. This balance is in part driven by the handling speeds at the port and ship hold capacities whereby faster handling speeds allow for a greater total transfer of containers both off and onto the vessel if sufficient room is available in the hold. It is understood there are issues at Felixstowe on getting this balance right and a work-around solution has been put in place. (Note 13) The port of Ipswich is already benefiting from the pressure to export containers, and is exporting 180,000 TEU per annum via feeder ships based on a 10 ha container storage yard.”*

*“Note 13 - In this respect, a clear demand for additional capacity to export empty containers has been supplied by the nearby Port of Ipswich which currently provides 3 feeder ships each transporting 170 TEU’s per day to the European port of Zeebrugge. The Port of Ipswich is currently able to store approximately 3,500 TEU for export via these feeder ships.”*

There is no evidence that the 2018 Port Study revisited this analysis.

1. **Lorry Parking**

The 2018 Study, whilst observing the need for additional HGV parking in the Eastern Area, says at para 4.20 sub para 5: *“No specific allowance has been made for lorry parking areas which are outside the scope of this assessment. These assumptions are consistent with the 2008 study.” (2008 Study page 2: “The land estimate does not include the quantity of land required for lorry parking.”)*

SCDC’s Final Plan, however, reads: *“Policy SCLP12.35: Land at Innocence Farm. A large-scale employment allocation of approximately 67ha is identified on the western part of the site at Innocence Farm to support the continued viability of the Port of Felixstowe and other related businesses including HGV parking.”*

To the extent that the 2018 Port Study explicitly excluded HGV parking from its analysis, this must mean that its inclusion at Innocence Farm would reduce the capacity of the 67Ha. to cater for the demands identified for container storage and warehousing.

It is also worth noting that the 2008 Study at page 23 said: *“A series of sites available alongside the A14, within Suffolk would offer a more environmentally acceptable option than one large site, and address traffic congestion issues at and east of A14/A12 Seven Hills interchange.”*

1. **The Biggest Mystery – the “67Ha. Pipeline”**

The Executive Summary of the 2018 Study says: *“Future supply. An assessment of the supply of land that might be, or become, available to meet future off-port land demand associated with the Port of Felixstowe over the new Suffolk Coastal Local Plan period has been undertaken as part of this study. Based on latest Council monitoring data, the existing pipeline supply of employment land that is in close proximity to the Port of Felixstowe and considered suitable for port-related activities totals just over 67 ha. This quantum would be sufficient – in quantitative terms – to accommodate the low and central case growth scenarios, while additional land would be required to meet the high growth case in full.”*

It would be important to identify which specific sites made up the 67Ha. in that Innocence Farm was not one of them. It would be even more important to understand how these conclusions can be consistent with SCDC now going for 67Ha. at Innocence Farm.

1. **Overall – 2018 compared with 2008**

It is readily apparent the 2018 Study bears little comparison to its impressive predecessor. Overall, it is a pale imitation in many respects not least to the extent that any consultation was minimal. Rather than a series of interviews before the Study and a workshop afterwards with major players (44) in the industry – shipping lines, logistics companies - and other local authorities – a single workshop was held involving only 14 local entities, referred to as “stakeholders” with land agents and estate agents among their number.

It also failed to address the various “metrics” of ports and logistics science, either ignoring them altogether or failing to establish current values for highly significant parameters, relying instead on long-since outdated values, unlikely to hold over the Plan period to 2036.

To their credit, the authors of the 2018 Study emphasise the extent to which they drew on the 2008 Study and that prudence would imply sensitivity testing around and between the important assumptions:

*“Caveats and limitations*

*4.27 The methodology outlined above applies a number of assumptions, generally consistent with the 2008 study and based on the best information available. The 2008 study was informed by interviews with operators in and around the Port of Felixstowe, and the broad assumptions have been reviewed again as part of the consultation to inform this study. However, self-evidently, altering any of the assumptions themselves or changing the way they interact with each other has the potential to impact upon the forecasts and resulting land requirements.”*

It is reasonable to suppose their client set the scene as to:

* the budget, thereby constraining the extent to which 2008 analysis could be fully updated and, thereby
* a limit to the scope for sensitivity testing
* It is also reasonable to conclude the client, having restricted the remit to east of the Orwell Bridge, would be content with the conclusions of the 2018 Study, in that it would serve as the evidence base for their objective to secure the status of “Employment Allocation ” for Innocence Farm.

1. **Conclusion**

Although SCDC would seem to have attempted, economically, to secure a new Port Study, as the evidence base for an Employment Allocation at Innocence Farm, 103.8Ha., recently reduced to 67Ha, they have been unsuccessful. The 2018 Study inherently acknowledges its huge limitations, which effectively render it unfit to inform a decision of such magnitude.

Furthermore, by revealing an existing pipeline of 67Ha., the 2018 Study effectively undermines SCDC’s case for the so-called “Central” requirement.

Finally, the Port itself at a recent meeting of the LAAC sought to correct a common misperception:

*“The term ‘Port related use’ as a planning category may lead to confusion regarding Port involvement. ‘Trade related’ would be a better term to use as planning permission is not given for the Port, but to support the UK’s international trade. The Port of Felixstowe is not the client.”*

1. **ADDENDUM: POST SCRIPT – Seismic Developments in World Maritime Trade**

The Plan stretches to 2036 – a very long time-frame. In both the short-and-medium term major dislocations are likely to affect the global shipping market not least the Port of Felixstowe.

**Firstly, China’s Belt and Road Initiative** is already under way and likely to cause serious disruption to existing patterns of trade: *“The China Railway Express (Chengdu), a direct freight line, takes only 12 days to transport goods from Chengdu to Europe, which can be two-thirds quicker than traditional shipping. The rail costs are roughly the same as maritime ones and about half those of air freight.”*

Source <https://www.telegraph.co.uk/news/world/china-watch/business/chengdu-infrastructure-development/>

**And then, the Northern Sea Route (NSR)** has already seen the first transit of a container ship – the Venta Maersk. *“It is therefore reasonable to expect that the next half century will see a gradual growth in shipping traffic in the NSR, the North West Passage and subsequently the Trans-Polar Route.”*

Source: <https://issuu.com/nautilustelegraph/docs/telegraph_february_2019>

**By Way of Comparison** – page 88 of the 2018 Port Study graphically depicts the largest container ships in 2000 as having had a capacity of 6,000-8000 TEUs. By 2018, it says, the largest ships had a capacity of 22,000 TEUs.

**Sources:**

**The 2018 Port Study**: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/Port-of-Felixstowe-Growth-and-Development-Needs-Study-July-2018.pdf>

**The 2008 Port Study**: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Document-Library/Infrastructure/FPLSFinalReport2008.pdf>

**The 2008 Port Study: Glossary; List of Interviews; Stakeholder Workshop; Container Capacity & Modal Splits; Calculation of Ancillary Services; Defining the Port Centric Zone; Capacity of the Port Centric Zone; Sensitivity Analysis; Significance of the Orwell Bridge:** <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CoreStrategyCoreDocList/FelixPortLogStudy2008App.pdf>

**SCDC Final Local Plan**:

<https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>