

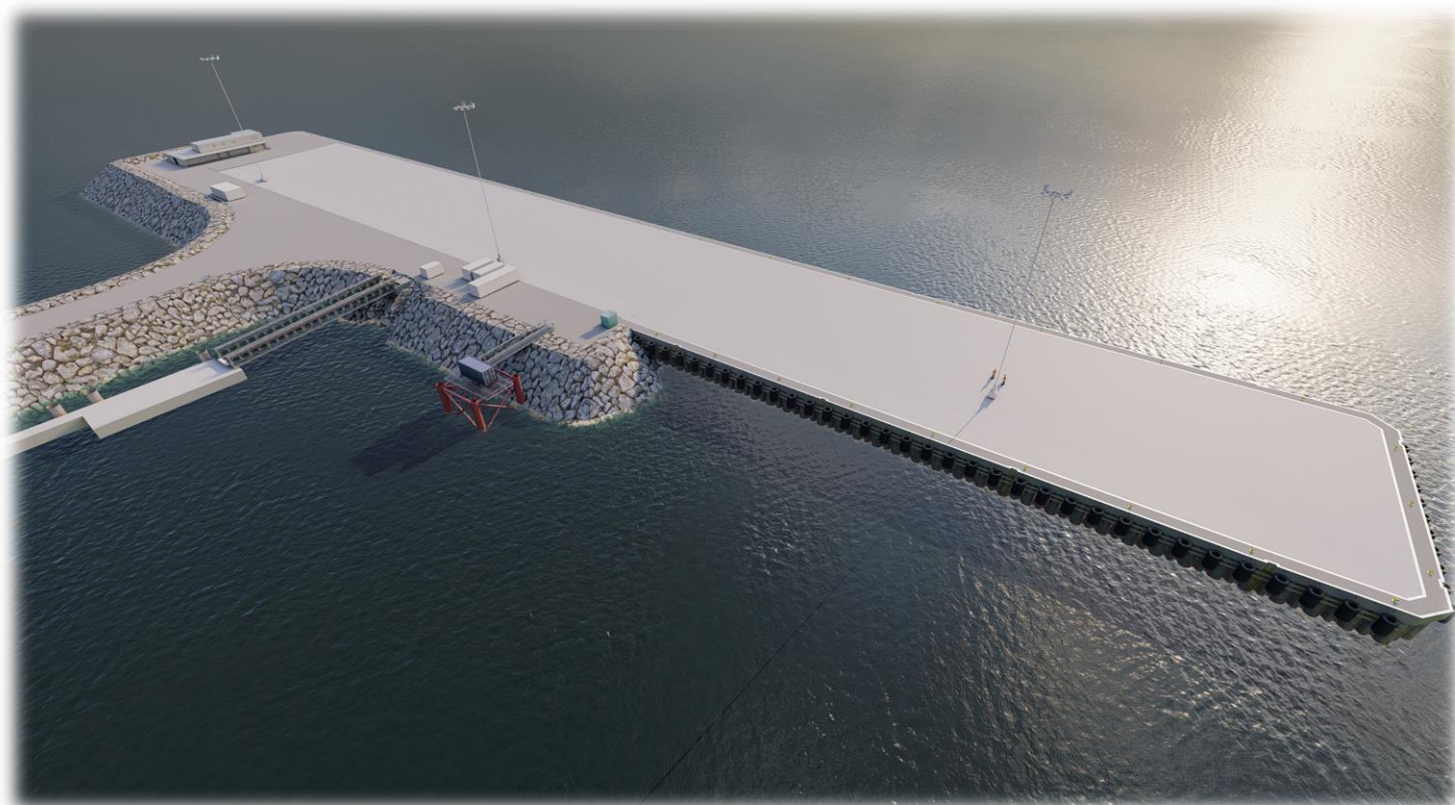


New Port Facility Falkland Islands

Planning Statement for Scuttling of FIPASS and working off barges methodology

Revision	Date	Description	Prep	Check	App
P03	22-Aug-2022	Final for planning approval	BH	MS	MS

	Contract No:	Doc No:	Status	Revision
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Hold Record

Hold No.	Section	Description of Hold

Revision Tracking

Revision	Description of Revision
P01	Issue to BAM for review
P02	Final for planning approval
P03	Update in response to Planning and Building Services comment during validation of application

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A1.0 Introduction

A1.1 Project summary

The economy of the Falkland Islands depends upon a Port and the Falkland Interim Port and Storage System (FIPASS) has been in operation since 1984. FIPASS is currently the main commercial port facility in the Falkland Islands.

Investigative work conducted between 2017 and 2019 has revealed a deteriorating condition of FIPASS and the system is nearing the end of its operational life. A new port facility is now required to serve the needs of traditional industries and support economic growth.

A planning application for a new port facility was submitted to the Falkland Islands Government (F.I.G.) in January 2022, with permission granted in March 2022 (reference 04.22.P; Ref. 1). The planning application for the facility was supported by an Environmental Impact Statement (EIS) (Ref. 2) and Planning Statement (Ref. 3).

F.I.G. is now considering an alternative option, which is preferred to the full removal methodology and dismantling of FIPASS structures assessed within the EIS for the new port facility (Ref. 2). The proposed alternative (herein 'the proposed scheme') comprises the temporary relocation and storage of the FIPASS structures in Stanley Harbour followed by towing to a location to the south-west of Lively Island for scuttling. It also proposes an alternative piling methodology of using some of the barges as working platforms now that dismantlement on shore is not required.

The implementation of the proposed scheme that is the subject of this planning application would mean that it would no longer be necessary to dismantle the FIPASS barges on the foreshore (as consented through planning permission 04.22.P). Consequently, F.I.G. has directed that a variation to planning permission 04.22.P is necessary to reflect the consequences of not dismantling the FIPASS barges on the foreshore. This will be achieved by the submission of a variation of condition application to F.I.G. which will be determined in parallel with the planning application for the proposed scheme.

A1.2 Report purpose

This report is a Planning Statement which is submitted in support of the planning application for the proposed scheme. It has been produced at the request of F.I.G. Planning and Building Services and presents the following information:

- A summary of the proposed scheme.
- Details of pre-application consultation undertaken.
- Planning considerations, specifically how the proposed scheme aligns with local policy.

A2.0 Definition of important terms, acronyms and abbreviations

This report makes reference to terms, acronyms and abbreviations which are defined in the following document:

Ref	Title
BAS2050-RHD-ZZ-YYY-DS-WD-0028	Definition of Important Terms, Acronyms and Abbreviations

A3.0 Reference documents

Ref	Title	Document Reference	Status
1	Planning permission (reference 04.22.P) for 'Removal and dismantling of FIPASS and its causeway, development of a new port facility with causeway and new access road and associated works (including temporary accommodation facilities and enabling works)'	F.I.G. Document 04.22.P	Publicly available
2	Environmental Impact Statement for new port development, consented under 04.22.P	PB7829-RHD-ZZ-ZZ-RP-YE-0002	Publicly available
3	Planning Statement for new port development, consented under 04.22.P	PB7829-RHD-ZZ-ZZ-RP-YE-0029	Publicly available
4	Environmental Impact Statement for proposed scheme	PB7829-RHD-ZZ-ZZ-RP-YE-5021	Publicly available
5	Non-Technical Summary of the Environmental Impact Assessment undertaken for scuttling of FIPASS	PB7829-RHD-ZZ-ZZ-FN-YE-5032	Publicly available

A4.0 Description of the proposed scheme

A4.1 Infrastructure proposed for scuttling

The structures that would be scuttled are as follows:

- FIPASS barges (6. No) – maximum dimensions of 92m x 28m x 17m per barge and top structures where applicable.
- FIPASS RoRo barge (1. No). – maximum dimensions of 46m x 19m x 4m.
- FIPASS causeway (5. No sections) – maximum dimensions of 32m x 9m x 2m per causeway section (to be secured to the north-eastern FIPASS barge for scuttling).
- FIPASS linkspans (10. No) – maximum dimensions of 16m x 14m x 10m per linkspan (to be secured to the north-central FIPASS barge for scuttling).

In addition, the proposed scheme will include scuttling four FIPASS mooring dolphins. The mooring dolphins consist of a number of steel elements (primarily tubular piles and connecting steel bracings) which are to be secured to a barge for scuttling

The proposed scuttling site (see **Drawing PB7829-RHD-ZZ-ZZ-DR-Z-5021**), an area to the south-west of Lively Island (in the vicinity of Shag Rock), was identified based on consultation with the Maritime Authority. The Maritime Authority confirmed that the site is outside of currently licensed fishing areas, is sufficiently deep to avoid risk to surface navigation and is of suitable seabed type. The area has previously been used for the scuttling of the fishing vessel *Elqui* in 2005.

A4.2 Construction phase

Full details of construction works are provided in the EIS that accompanies the planning application for the proposed scheme (Ref. 4). To summarise, construction phase works comprise the following:

- Preparatory works to FIPASS structures prior to towing and scuttling:
 - Removal of materials with hazardous properties.
 - Soft strip and removal of top structures on FIPASS barges where applicable.
 - Repairs to damage and corrosion of FIPASS barges and load preparation on deck.
 - Temporary relocation and re-ballasting of FIPASS barges (including RoRo) prior to scuttling.
 - Installation of navigational lights and signals to FIPASS barges.
 - Preparation of means of embarkation onto FIPASS barges.
 - Removal of ballast tank water and sediment from the most contaminated tanks (currently assessed as 6 number), which includes those where the ballast water is classed as hazardous. Water and sediment from the tanks would be removed and transported to separated geotubes located in a bunded and lined area adjacent to Stanley Harbour.
 - De-ballasting of water from ballast tanks containing non-hazardous material into Stanley Harbour to allow for structural repair, freeing ports and other preparation works.
 - Water ballasting prior to towing.
 - Preparation of main towing points.
 - Creation of freeing ports in warehouse sides and ends on FIPASS barges.
 - Placement of anchors at the scuttling site to moor the FIPASS barges.
 - Preparation, lifting and securing of causeway structures and dolphins onto FIPASS barges.

Drawing PB7829-RHD-ZZ-ZZ-DR-Z-5021

- Towing and scuttling operations:
 - Tow from Stanley Harbour to the scuttling site.
 - Attachment of barges to pre-set anchors.
 - Removal of navigational equipment (where possible).
 - Disconnect towline and emergency towline.
 - Open vents.
 - Pulling of activation wire to mechanically open valves to allow ingress of water for scuttling.

Embedded mitigation measures (i.e. those built into the project design) to reduce potential environmental impacts are detailed in the accompanying EIS (Ref. 4). To summarise, such measures include:

- Measures to manage the risk of accidental spillages of oils, fuels and chemicals during the construction phase.
- Measures to minimise the risk of accidental sinking of FIPASS structures while on route to the scuttling site.
- Measures to manage risks to navigation and the safety of crew.
- Biosecurity risk management measures.
- Measures to minimise the impact to benthic habitats / communities at the scuttling site.
- Working off barges to reduce programme duration.
- Scuttling of barges to reduce hinterland impact.

A4.3 Post-scuttling phase

During the post-scuttling phase, the scuttled FIPASS structures are predicted to remain on the seabed at the scuttling site to naturally corrode and erode into the seabed. No works would be undertaken during the post-scuttling phase.

A5.0 Pre-application consultation

As part of the design development for the proposed scheme, proactive initial engagement was undertaken with key users, industry sectors and interested parties (stakeholders). Through this process, information was gathered to inform the preferred location for the scuttling site, the potential environmental risks associated with scuttling and the scope of survey and assessment required in support of the planning application.

Consultation with the following parties was undertaken:

- Falklands Conservation, as a stakeholder and a landowner of Motley Island and Little Motley (The Mot), Sal Island and Middle Island, that would be passed at various distances from the proposed towing route to the scuttling site.
- The owners of Bleaker Island, which is located approximately 8 miles from Shag Rock.
- The owners of Lively Island, which is located approximately 12 miles from Shag Rock.

SAERI Falklands Ltd (SFL) undertook the benthic surveys at the proposed scuttling site and provided input to the assessment of the potential direct impact of the proposed scuttling on the benthic community. SFL also undertook a survey of the marine invasive non-native species (INNS) currently present on the FIPASS structures.

Meetings were also held with the Harbour Master and Master Mariners group to discuss the potential for impacts on navigation both in the harbour and along the proposed towing route and to identify risks to navigation.

A6.0 Planning considerations

The following sections outline Falkland Island development / planning policies and objectives relevant to the planning application for the proposed scheme. The tables set out a review of construction phase activities associated with the proposed scheme against relevant policies (noting that there are no activities associated with the post-scuttling phase).

The tables do not include a review of policies against other aspects of the wider development of the new port facility, as a review has already been undertaken (see Ref. 3) and planning permission has been granted. While all policies within the following documents have been considered, the tables only refer to those policies which are relevant to the proposed scheme. Given that the proposed scheme refers specifically to the preparation and undertaking of temporary relocation and subsequent scuttling of FIPASS structures, the number of relevant policies is limited.

A6.1 Falkland Islands Development Plan

The Falkland Islands Development Plan (hereafter referred to as ‘the Development Plan’) was adopted in August 2015. The Development Plan sets the framework for future spatial development of the Islands (including the determination of planning applications). It includes the national Structure Plan, which provides the overall strategic approach, and Town Plans which provide more details for specific areas. The Town Plan for Stanley is directly applicable to the proposed scheme. Although the two elements (the Structure Plan and the Town Plan for Stanley) are presented together in one document for ease of use, legally they are separate entities.

The Development Plan states that F.I.G.’s overarching principle when considering development proposals is to take a positive approach that reflects a broad presumption in favour of sustainable development. A review of the policies within the Structure Plan and the Stanley Town Plan has been undertaken to consider how the proposed scheme aligns with applicable policy. This information is presented in **Table 6.1**.

A6.2 The Islands Plan 2022-2026

The Islands Plan 2022-2026 (F.I.G., 2022) sets out a series of vision statements and actions relating to areas including self-determination and public diplomacy, protecting the environment, sustained economic development, community and culture, safety and security, health ,wellbeing and social care, education and training and social equity.

The Islands Plan (2022-2026) is a material consideration in the determination of planning applications and, therefore, **Table 6.2** presents an analysis of how the proposed scheme relates to the applicable vision statements and actions set out in The Islands Plan.

A6.3 State of the Environment 2020

F.I.G.’s State of the Environment 2020 report (F.I.G., 2020) provides a baseline which sets out the status and condition of major environmental resources of the Falkland Islands. The State of the Environment 2020 report also quotes various United Nations Sustainable Development Goals and, for some areas, Falkland Islands specific objectives and indicators (e.g. with respect to fisheries and biodiversity). Applicable goals, objectives and indicators from the plan, and how the proposed scheme aligns with them, are detailed in **Table 6.3**.

Table 6.1 Applicable policy within the Falklands Islands Development Plan, The Islands Plan, State of the Environment and Falkland Islands Environment Strategy and comment regarding how the proposed scheme aligns with the policy

Policy	Description	Comment	Compliant with policy?
Falkland Islands Development Plan: Structure Plan			
Vision and objectives			
Objective 1	To facilitate sustainable economic growth over a range of sectors (both new and existing), and to ensure that our communities have the skills and opportunities to contribute to, and benefit from, this growth.	The proposed scheme forms part of the wider development of a new port facility, for which planning permission has been granted (F.I.G. document ref. 04.22.P; Ref. 1). The Planning Statement for the new port facility (Ref. 3) demonstrated that the facility would promote future increase in revenue and economic growth for the Falkland Islands hence would contribute to achievement of this objective.	Yes
Objective 3	To support all our communities in living healthy lives, in an attractive, safe and clean environment which facilitates walking and other outdoor pursuits.	<p>The proposed scheme provides an alternative to the process for removing and dismantling existing FIPASS structures consented under planning permission (04.22.P; Ref. 1). Implementation of the proposed scheme would avoid the need for the following (consented) works / activities to be undertaken:</p> <ul style="list-style-type: none">• Construction (and removal on completion) of a slipway on the foreshore.• Dismantling of FIPASS on the foreshore.• Transport and storage of FIPASS temporarily on land until the new port facility is constructed.• Transport of the dismantled FIPASS from the storage area to the new port facility for loading onto ships.• Shipment of FIPASS from the new port facility abroad for recycling <p>The environmental impacts (a number of which caused concern to local residents during the planning determination process for the new port facility, particularly associated with dismantling FIPASS on the foreshore) associated with the above activities, would not occur should the proposed scheme be taken forward.</p> <p>Removal of the FIPASS structures is integral to development of the wider port facility development, for which planning permission has been granted (04.22.P; Ref. 1). The Planning Statement for the port facility (Ref. 3) demonstrated that the new facility would promote a cleaner environment for the local community at Stanley.</p>	Yes
Objective 4	To value, protect and enhance our built and natural heritage, ensuring new developments are sustainable and contribute to, rather than detract from, these assets.	Given the nature of the proposed scheme, there would no significant impact on built and natural heritage of the Falkland Islands. Assessment of heritage impacts were thus scoped out of the EIA, in agreement with F.I.G. (detail provided in the accompanying EIS, Ref. 4).	Yes
Objective 5	To maximise efficient use of resources, take into account the potential long term impacts of climate change and safeguarding the health of our air, water, soils and ecosystems.	<p>It is recognised that the proposed scuttling of FIPASS will require local resources (notably vessels and some construction staff). However, the proposed scheme has been designed to minimise the risk of environmental impact to water and ecosystems. Given the nature of the proposed scheme, impacts on soils and air quality were thus scoped out of the EIA, in agreement with F.I.G. (details provided in the accompanying EIS, Ref. 4).</p> <p>As set out in the EIS (Ref. 4), a hazardous materials survey of the FIPASS structures has been undertaken and most materials classed as ‘hazardous’ waste – including areas of paintwork with active contaminants and hazardous ballast tank water within some of the ballast tanks – would be removed for treatment / appropriate disposal prior to scuttling. A limited volume of bottom of tank sediment in the remaining tanks will be scuttled as it is too hazardous to human health to remove the remaining material.</p> <p>Measures will be undertaken to a) remove INNS known to be present on FIPASS structures and b) minimise risk of transfer of INNS on the structure and in the ballast water taken from Stanley Harbour. Such measures aim to reduce the risk of introducing INNS to ecosystems at the scuttling site.</p> <p>Other embedded mitigation measures, such as robust pollution prevention measures, will be adopted by the Contractor to avoid unnecessary risk to the marine environment.</p>	Yes

Policy	Description	Comment	Compliant with policy?
<i>Policy</i>			
SP1 – Supporting development	Planning applications that accord with the policies in the Structure Plan (and, where relevant, with policies in any Local Plan) will be approved without unnecessary delay unless material considerations indicate otherwise.	As detailed within this table, it is considered that the application accords with the policies in the Structure Plan and the Town Plan and therefore should be approved without unnecessary delay.	Yes
SP4 – Sustainable development principles	<p>Proposals will only be supported where they comply with the principles set out below.</p> <p>A. To protect the general amenity of the future occupiers and surrounding area, proposals must:</p> <ol style="list-style-type: none">1. Be of an appropriate design and layout;2. Respect the scale of the site and surrounding area (including the established building form);3. Show how they have considered opportunities for sustainable construction techniques (including micro-renewables);4. Provide suitable access and parking arrangements and avoid or fully mitigate any unacceptable levels of traffic generation;5. Provide suitable landscaping, open space, footpaths and amenity areas (as relevant);6. Where relevant, contribute to the attractiveness of inter- and intra-island ‘Ports of Entry’ by sea and air, and (for routes into main settlements) by road;7. Avoid or mitigate any unacceptable impacts on local amenity;8. Not be in conflict with the predominant use of the area or unnecessarily prejudice the potential to develop adjacent land; and9. Show how the site is capable of being effectively serviced. <p>B. In assessing whether proposals comply with the above principles, regard will be had to the economic, social and environmental benefits of the proposal and, where relevant, to issues of viability and practicality. However, proposals will not be supported which:</p> <ol style="list-style-type: none">1. Pose an unacceptable risk to the environment;2. Result in a significant reduction in air or water quality; or3. Compromise the health and safety at the site or surroundings (including in relation to flooding, fire and the potential presence of mines).	<p>Given the nature of the proposed scheme, a number of the sustainable development principles are not applicable (as the proposed scheme does not actually comprise construction of structures). However, some of the broader principles are considered to be applicable, including principles A7, A8 and B1 to B3.</p> <p>A detailed EIA has been undertaken to assess the potential environmental impacts on a range of receptors and parameters. The scope of the EIA was agreed with F.I.G. Planning and Building Services in April 2022. The outputs of the EIA are presented in the EIS (Ref. 4).</p> <p>With regard to principle A7, it is predicted that there will be a very short period during the construction phase when the use of FIPASS barges as working platforms will result in some disruption to navigation and operations at FIPASS. A tug will be provided for operational berthing use for the periods of compromised berthing (i.e. relative to the existing situation).</p> <p>With regard to principles A7 and A8, no significant impacts on local amenity or conflict with other marine area users are anticipated. Temporary relocation activities and subsequent towing / scuttling would be co-ordinated in liaison with the Harbour Master. Although the proposed towing route would pass alongside recreational areas to the east of Stanley Harbour, there would be no mechanism for significant impact on local amenity. The proposed scuttling site is located a considerable distance from Stanley Harbour, in deep waters to the south-west of Lively Island. The scuttling site was identified by the Maritime Authority at F.I.G. and has already been used for the scuttling of the fishing vessel <i>Elqui</i> in 2005. The site is of sufficient depth to avoid impacts to navigation and is outside of fishing areas.</p> <p>With regard to principles B1 to B3, the EIS (Ref. 4) describes a number of embedded measures that would be implemented into the construction phase of the proposed scheme to minimise risk to the environment. Impacts on air quality and terrestrial receptors have, in agreement with F.I.G., been scoped out of the EIA, on the basis that there would be no pathway for significant adverse impact. Following benthic surveys of the general area within a 2km x 2km grid, areas of coarse sand substrate at depths in excess of 55m (habitat of relatively low biodiversity) would be used for scuttling of the FIPASS structures, rather than the more biologically diverse bedrock habitats in shallower waters within the reviewed grid.</p> <p>A hazardous materials survey of the FIPASS structures has been undertaken and most materials classed as ‘hazardous waste’ – including areas of paintwork with active contaminants and ballast tank water within some of the ballast tanks – would be removed for treatment / appropriate disposal prior to scuttling. Water within ballast tanks that is not classed as having hazardous ballast water would be de-ballasted into Stanley Harbour, in line with existing working processes at FIPASS and the wider harbour. For health and safety reasons, limited volume base of tank sediments within the ballast tanks would be left <i>in situ</i> for the scuttling.</p> <p>The EIS (Ref. 4) identifies measures that will be undertaken to a) remove INNS as far as is reasonably practicable known to be present on FIPASS structures and b) minimise risk of transfer of INNS in ballast water taken from Stanley Harbour. Such measures aim to minimise the risk of introducing INNS to ecosystems at the scuttling site.</p> <p>There are no known mechanism by which the proposed scheme would compromise health and safety at Stanley Harbour or elsewhere that are not detailed within control measures within the EIS and the supporting CEMP.</p>	Yes
SP5 – Historic and natural environment	Proposals will only be supported where they comply with the principles set out below.	With regard to the principles related to the historic environment, impacts on built and natural heritage were scoped out of the EIA, in agreement with F.I.G. (detailed in the accompanying EIS, Ref. 4), on the basis that there would be no pathway for significant adverse impact.	Yes

Policy	Description	Comment	Compliant with policy?
	<p>A. Proposals must protect and, where relevant, enhance and interpret the historic and natural environment, including minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>B. Proposals which affect the historic environment must:</p> <ol style="list-style-type: none"> 1. Conserve any Listed Building on the site 2. Take account of any Conservation Area Guidance (where relevant) in the design stage 3. Provide for appropriate archaeological works on sites where there is a likelihood of significant historic finds 4. Not adversely affect nationally important remains (whether listed or not) and their settings. <p>C. Measures Aimed at securing the future of historic ship remains will be supported.</p> <p>D. To protect the natural environment proposals must:</p> <ol style="list-style-type: none"> 1. Not have any significant adverse impact upon species protected by law and not adversely affect the integrity of any internationally or nationally designated nature conservation site 2. Demonstrate that there are no alternative solutions, there are imperative reasons of over-riding public interest and that any impacts are avoided, mitigated and compensated for as far as is practicable. <p>E. Where proposals are for development and land use changes that are likely to have a significant impact on landscape, they must be informed by an assessment of the capacity of the landscape to accommodate the proposed development.</p>	<p>With regard to principle A of this policy, the EIS (Ref. 4) describes a number of embedded measures that would be implemented into the construction phase to minimise risks to biodiversity. Following benthic surveys of the 2km x 2km areas of coarse sand substrate at depths in excess of (habitat of low biodiversity value) have been identified for scuttling of the FIPASS structures, rather than the more biologically diverse bedrock habitats in adjacent shallower areas within the grid. To prevent spread / introduction of INNS at the scuttling site (or elsewhere on the towing route), reasonable measures will be undertaken to a) remove INNS known to be present on FIPASS structures and b) minimise risk of transfer of INNS in ballast water taken from Stanley Harbour.</p> <p>The scuttled structures would represent a change in habitat present at the site; there is potential that this may result in an increase in biodiversity on a very local scale as the structures become colonised.</p> <p>With regard to principle D of this policy, the benthic surveys did not identify any species protected by law present within the scuttling site or elsewhere in the survey area. An assessment of impacts on marine mammals is presented in the EIS (Ref. 4); this concludes that no significant impacts would arise during towing operations, scuttling or subsequent to the scuttling.</p> <p>With regard to principle E, there is no mechanism by which the proposed scheme would have a significant impact on landscape, since the FIPASS structures would be scuttled on the seabed and therefore out of view. Compared to the beach dismantlement option consented, it has a short term positive impact as the beach dismantlement site and slipway would not be required.</p>	
SP8 – Rivers, coastal areas and territorial sea	<p>The sustainable development within rivers, coastal areas and the territorial sea will be supported in accordance with the principles set out below subject to compliance with all other relevant policies (including SP4 and SP5).</p> <p>A. Developments within the territorial sea will only be supported where:</p> <ol style="list-style-type: none"> 1. There are clear operational reasons for the development; 2. The benefits significantly and demonstrably outweigh any adverse impacts, when assessed against the Vision, Objectives and policies as a whole; 3. Any adverse impacts are avoided, mitigated and compensated for as far as is practicable; 4. The proposal is accompanied by a detailed assessment of the potential environmental impacts and how these are to be avoided, mitigated or compensated for; and 5. The proposals can be accommodated as part of the sustainable management of the marine environment. <p>B. Marine and freshwater aquaculture proposals, together with any associated proposals on land, will:</p> <ol style="list-style-type: none"> 1. Be considered against the impact on marine ecology, biodiversity and heritage resources, water quality and catchment and visual amenity and landscape / coastal quality. 	<p>It is considered that there are clear operational reasons for the proposed scuttling activity to be located within the territorial sea and the rationale for this is presented in the accompanying EIS (Ref. 4). No further justification is considered necessary.</p> <p>The proposed scheme is being progressed as an alternative to the consented approach of dismantling FIPASS on the foreshore. Implementation of the proposed scheme would avoid the need for the following works / activities to be undertaken:</p> <ul style="list-style-type: none"> • Construction (and removal on completion) of a slipway on the foreshore. • Dismantling of FIPASS on the foreshore and effect on Stanley Growers Ltd north-eastern field. • Transport and storage of FIPASS temporarily on land until the new port facility is constructed. • Transport of the dismantled FIPASS from the storage area to the new port facility for loading onto ships. • Shipment of FIPASS from the new port facility abroad for recycling. <p>The environmental impacts (a number of which caused concern to local residents during the determination process for the new port facility, particularly associated with dismantling FIPASS on the foreshore) associated with the above activities would not occur should the proposed scheme be taken forward.</p> <p>While it is recognised that there may be some adverse effects associated with the scuttling of the FIPASS structures (assessed in detail in the accompanying EIS, Ref. 4), the EIS describes a number of embedded measures that would be implemented into the construction phase to minimise the risk of adverse impacts on the environment within the territorial sea.</p> <p>With regard to principle A2, it is predicted that there will be a very short period during the construction phase when the use of FIPASS barges as working platforms will result in some disruption to navigation</p>	Yes

Policy	Description	Comment	Compliant with policy?
	<p>2. Only be supported where they demonstrate no significant adverse impact on the environment.</p> <p>C. Proposals associated with the sustainable development of recreational fishing activities and facilities will normally be supported.</p> <p>D. Proposals on areas liable to coastal erosion will normally only be supported where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> 1. Is of a temporary nature; or 2. Will not give rise to, or require, defence measures. <p>E. Where possible a coastal buffer of 50 metres of the width inland from the high-water mark along all coastlines shall be maintained.</p>	<p>and operations at FIPASS. A tug will be provided for operational berthing use for the periods of compromised berthing (i.e. relative to the existing situation).</p> <p>As principles B to E relate to aquaculture and fishing proposals, or proposals for coastal developments that may contribute to coastal erosion, they are not relevant to the proposed scheme.</p>	
Stanley Town Plan			
TP5 – Port Developments	<p>In accordance with Structure Plan Policy SP2: Distribution of Development and SP3: Infrastructure, the continued development of Stanley and Port William to provide port facilities will be supported in accordance with the principles summarised below.</p> <ul style="list-style-type: none"> - Development within Zone 7 of a deep water port at Port William, will be supported subject to the provision of a detailed masterplan and mitigation of any unacceptable environmental impact. The masterplan will need to address various issues, including minimising impact on amenity (noise and light) and protecting built heritage. - Measures to maximise the quality of the services provided by FIPASS and the TDF will be supported for commercial port facilities. 	<p>The proposed scheme provides a feasible alternative to the removal, onshore storage and dismantling of the existing structures as permitted for the wider port facility development (consented under planning permission 04.22.P; Ref. 1). Implementation of the proposed scheme would avoid the need for the following (consented) works / activities to be undertaken:</p> <ul style="list-style-type: none"> • Construction (and removal on completion) of a slipway on the foreshore. • Dismantling of FIPASS on the foreshore and effect on Stanley Growers Ltd north-eastern field. • Transport and storage of FIPASS temporarily on land until the new port facility is constructed. • Transport of the dismantled FIPASS from the storage area to the new port facility for loading onto ships. • Shipment of FIPASS from the new port facility abroad for recycling. <p>Removing the need for the above works is likely to reduce amenity issues relating to light and some of the construction noise since there will be no requirement for onshore dismantling.</p> <p>The removal of the existing structures is an integral part of the consented wider development.</p>	Yes
TP8 – Temporary Workers Accommodation	<p>Proposals for short-term accommodation will be supported in accordance with the principle set out below, and subject to compliance with other relevant policies.</p> <p>A. Proposals for temporary structures to provide worker accommodation associated with specific construction projects will be supported within the vicinity of the specific construction project.</p> <p>B. Proposals for temporary structures to provide worker accommodation associated with specific construction projects will be supported on land allocated for other uses where the indicative phasing of the proposed is later than the proposed duration of the use for temporary workers accommodation.</p>	<p>Details of the temporary worker accommodation are unchanged from those provided for the wider port facility development, which was consented under planning permission (04.22.P; Ref. 1). The location of the proposed temporary accommodation block has been discussed and agreed with F.I.G. and PWD in advance of that planning application being submitted. The Planning Statement for the wider development (Ref. 3) demonstrated compliance with this policy.</p>	Yes
TP9 – Stanley's Heritage	<p>Proposals will protect and, where possible, enhance and interpret Stanley's rich heritage in accordance with the principles set out below.</p> <p>A. Development proposals for sites within the conservation area in the historic centre of Stanley will only be supported where they do not adversely affect the historic character of the area.</p> <p>B. Where key views / vistas / landmarks are identified through a Conservation Area Appraisal, proposals will normally be supported only where they are retained / enhanced.</p>	<p>Given the nature of the proposed scheme, there would no impact on Stanley's heritage assets or conservation areas. Heritage impacts were thus scoped out of the EIA, in agreement with F.I.G. (detail provided in the accompanying EIS, Ref. 4).</p>	Yes

Policy	Description	Comment	Compliant with policy?
	<p>C. Where trees are identified through a Conservation Area Appraisal, proposals will normally be supported only where they are retained / replaced.</p> <p>D. Proposals to maintain, enhance and interpret historic wrecks and memorials of Stanley will be supported.</p>		
TP10 – Open Space	<p>The protection and provision of open space will be in accordance with the principles set out below.</p> <p>A. Proposals which undermine the open characteristics of visual amenity open space including the ship names to the west of the Camber will generally be resisted unless both an overriding need can be demonstrated and the criteria of SP4 can be met.</p> <p>B. The general extent of Stanley Common is to be retained. Proposals which contribute towards the appropriate use and management of the Common will normally be supported. Proposals which result in the loss of Common Land will only be supported in exceptional circumstances and where there is no net loss of common land (in terms of both quantity and quality).</p> <p>C. Proposals adjacent to Stanley Common will only be supported where they take into account current locations of tracks and gates and either preserve these or identify/create alternatives.</p> <p>D. Proposals which might result in a reduction in the quality or quantity of open space (including that shown on the proposals map) will be assessed against Structure Plan policy SP2(D).</p>	<p>The proposed scheme provides an alternative to the process for removing and dismantling existing FIPASS structures consented under planning permission (04.22.P; Ref. 1). Implementation of the proposed scheme would avoid the need for the following (consented) works / activities, which were assessed to have a potential for temporary adverse effect on the Seafarer's Mission (Ref. 2):</p> <ul style="list-style-type: none"> Construction (and removal on completion) of a slipway on the foreshore. Dismantling of FIPASS on the foreshore and effect on Stanley Growers Ltd north-eastern field. Transport and storage of FIPASS temporarily on land until the new port facility is constructed. Transport of the dismantled FIPASS from the storage area to the new port facility for loading onto ships. Shipment of FIPASS from the new port facility abroad for recycling. <p>Instead, FIPASS structures would be scuttled offshore at depths in excess of 55m and out of view.</p> <p>Temporary relocation of the barges within Stanley Harbour (to a site immediately east or south of their existing location) would constitute no significant change to visual amenity.</p> <p>As such, there is no mechanism by which the proposed scheme would have a significant impact on visual amenity or open space in Stanley.</p>	Yes
TP11 – Transport Infrastructure and Management	<p>Transport Infrastructure and Management will be supported in accordance with the principles set out below and compliance with all other policies.</p> <p>A. We will address traffic management issues in Stanley. Where flow and/or parking is seen to represent an unacceptable hazard to road or traffic safety, measures will be taken to alleviate these problems.</p> <p>B. Proposals which involve the construction of new roads will only be supported where supporting information is provided which demonstrates how the roads will function.</p> <p>C. Proposals will normally only be supported where they meet specified parking standards.</p> <p>D. We will support and develop initiatives that facilitate journeys to be made on foot and cycle.</p>	<p>There is no requirement for further infrastructure construction / modification related to the proposed scheme beyond details consented under planning permission (04.22.P; Ref. 1) . Preparatory works would be undertaken from the FIPASS barges themselves and would be in keeping with the wider port facility development works that are consented under planning permission (04.22.P; Ref. 1).</p>	Yes

Table 6.2 Applicable visions within The Islands Plan and comment regarding how the proposed scheme aligns with those visions

Topic	Vision and Actions	How the proposed scheme relates to the vision statements and commitments
Protecting the Environment	We will deliver the first four years of the Environment Strategy.	As detailed throughout the EIS (Ref. 4), the proposed scheme has the potential to give rise to environmental impacts. However, the EIS sets out a range of mitigation measures that would be implemented to reduce the significance of potential impacts. The selection of the proposed scuttling site on coarse sand substrate has been informed by the marine benthic surveys that confirm this area is low diversity and a widespread habitat. The scuttling will therefore avoid adjacent bedrock habitat with higher biodiversity interest. The EIS sets out a number of measures that will be in place to reduce the risk of the introduction or spread of INNS to the scuttling site or elsewhere on the towing route, thereby safeguarding native biodiversity.
	We will ensure we have the appropriate framework and measures in place to protect our environment against potential biosecurity risks.	
	We will proceed with a range of targeted actions and interventions, to shield and support our natural biodiversity across the Falkland Islands.	
	We will carry out work to measure and reduce our carbon emissions, in order to ensure we act as a responsible global citizen.	
	We will encourage responsible and ecological use of land and water, and make progress in restoring degraded land in public ownership.	
	We will increase our knowledge and awareness of the best, and most viable ways, to ensure we have an environmentally sustainable future.	

Table 6.3 Applicable policy within the Falkland Islands ‘State of the Environment 2020’ report and comment regarding how the proposed scheme aligns with the policy

Policy	Description	Comment
Marine waste	UK SDG Target 14.1: By 2025, prevent and significantly reduce marine pollution of all kinds	Due to health and safety issues, the removal of a small volume of contaminated ballast tank sediment from all ballast tanks within the FIPASS barges is unfeasible, hence (with the exception of tanks with hazardous ballast water material) it will be left <i>in situ</i> . As set out in the EIS (Ref. 4), measures will be implemented to reduce the risk of marine pollution via other pathways.
Biodiversity	UK SDG Target 15.5: Take urgent and significant action to reduce degradation of natural habitats, halt the loss of biodiversity and by 2020, protect and prevent the extinction of threatened species	The embedded mitigation set out in the accompanying EIS (Ref. 4) includes detail on the selection of the scuttling site. Site selection on coarse sand substrate has been based on marine benthic surveys that indicate this is low diversity and widespread habitat and avoids adjacent bedrock habitat with higher biodiversity interest.
	Falkland Islands Target: Protection of key biodiversity areas	The EIS also sets out a number of measures that will be in place to reduce the risk of introduction or spread of INNS to the scuttling site or elsewhere on the towing route, thereby safeguarding native biodiversity.
Biosecurity and invasive species	UK SDG Target 15.8: By 2020, introduce measures to prevent the introduction and significantly reduce the impact of invasive alien species no land and water ecosystems and control or eradicate the priority species	As noted above, a number of measures are set out in the accompanying EIS (Ref. 4) to minimise where possible the risk of spread or introduction of INNS, through a) spread of INNS already present on the FIPASS structures; b) spread of INNS via ballast water taken from Stanley Harbour (where INNS are known to be present); and c) INNS introduced via construction vessels / plant etc. sourced elsewhere.
Clean water	Falkland Islands Indicator: All beaches and shorelines meet Blue Flag standards	The scuttling site is offshore and in deep water. Sufficient dilution of any contaminants within the water column resulting from the scuttling would be rapid and there would be no risk of adverse effects on the water quality at beaches and shorelines. In Stanley Harbour, hazardous materials removed from the ballast tanks and on the FIPASS structures themselves would be removed and treated / disposed of. Water in the ballast tanks where contaminant levels are not classed as ‘hazardous’ would be discharged into Stanley Harbour, as per existing FIPASS and wider harbour processes.
Combatting climate change	Kyoto Protocol and Doha Amendment Actions: Decrease greenhouse gas emissions	A greenhouse gas assessment has been undertaken and is presented in the accompanying EIS. The assessment concludes that there would be no risk of significant greenhouse gas emissions from the proposed scheme (it would represent less than 0.5% of the Falklands annual total, even as a precautionary estimate).

