

SUBMISSION FROM FORTH PORTS PLC

I am writing with regard to the forthcoming finalised draft of the National Planning Framework as we have specific concerns about the influence that the document will have on building a sustainable Ports Policy for Scotland, as it designates a wholly new Port on the Firth of Forth, without sufficient consideration of the implications of that decision (National Development 5: Rosyth International Container Terminal). We believe that our concerns will be of particular interest to the Transport Committee. We have recently held a meeting with the Chief Planner and planning officials, where we have raised these concerns, and indicated that we would bring them to your attention:

(a) Forth Ports has commissioned demand forecasts for container/freight movements in and out of Scotland and we have based our investment in increasing capacity at Grangemouth on these forecasts. Officials have highlighted that the submission from Babcock in relation to Rosyth uses alternative forecasts, but these have not been made available to us or others for an informed debate about the most likely scenarios giving rise to the need for additional container capacity, particularly in the current economic climate for global trade. I believe this debate is important before the NPF is put before Parliament.

(b) Ports Policy elsewhere in the UK favours incremental development of existing container sites as opposed to brown field/green field development of new container capacity. This is on the basis that costs are cheaper, environmental costs are lower and this leads to a more efficient supply chain. Officials would not appear to have addressed this particular issue as a matter of policy and it would come up in the NPF if further expansion of Grangemouth incrementally were weighted against the creation of capacity on new sites. Again, I believe this is an important issue for the NPF to address before any debate in Parliament.

c) We and the planning officials all agreed there should be a link between the NPF and the proposed marine spatial planning for the Forth which is likely to be a result of the new Marine Bill, so that there is a joined up approach to economic development in the Forth Estuary.

We believe discussion around the need for further container capacity in Scotland should take account of the above factors and the NPF should be open about the location for development of such capacity evaluating alternatives against a range of criteria such as depth of water, location in relation to the ship height restrictions of the Forth Bridge, availability of onward transport connections, environmental effect, etc.

I would stress that we are fully supportive of the concept of national developments and planning and the idea that once designated a national development, the need for a particular facility is established. We are, of course, delighted to see Grangemouth, Scotland's largest container port, recognised in this way.

Overall. I would urge the Transport Committee to look at Ports Policy across Scotland to ensure that the NPF endorses the most viable and sustainable option, and would be happy to meet to discuss if this would be of assistance.

Charles C Hammond
GROUP CHIEF EXECUTIVE