

SUBMISSION FROM FORTH PORTS PLC

Following publication of the Proposed National Planning Framework 2 (PNPF2) on Friday 12 December, we are writing to express concern that the document laid before Parliament for 60 days' Parliamentary scrutiny is flawed with regard to its impact on Scottish Ports Policy, as the PNPF2 retains a proposal for an additional container port at Rosyth.

Forth Ports operates Scotland's largest container facility at Grangemouth, has based its investment decisions on estimates of container traffic growth, and considers there to be sufficient capacity to serve Scotland's container shipping needs on the east coast for the foreseeable future. There are no capacity constraints in the current operation of the Port. In the longer term, the operating capacity can also be increased through future investment.

The container facility proposal for the Babcock property at Rosyth has been included in the PNPF2 as a National Development, for which the need has been proven. The process involved Ministers publishing the criteria by which National Developments were to be assessed, and, then Government officials undertaking a tick-box assessment of those potential projects that were put to them. This assessment process is inevitably flawed as it both lacks transparency and only considers a limited range of potential projects. The only evidence that there is a need for a new container facility at Rosyth to serve Scotland has come from the owner of the land in question. There has also been no attempt to assess suitability of the proposed location for shipping, in the event that it is accepted that there is a need for increased capacity.

We have requested, and continue to press for Scotland's port capacity and need for port infrastructure and investment to be assessed independently, and for this assessment to inform the NPF process. As there is no short or medium term capacity constraint, this assessment could be undertaken in order to inform the third NPF in four years' time — there is no imperative to create new port capacity through the PNPF2. In the event that there were identified to be a need for new capacity in the future, both the principles of good planning and the proper use of the Strategic Environmental Assessment process would require a consideration of alternative locations, using a range of suitable criteria for example depth of water, location in relation to the height restriction placed by the Forth Bridge, and access to road and rail connections.

We would like to request an opportunity to meet with you to discuss these issues in relation to the Communities Committee's scrutiny of the PNPF2. Our objective is to have the National Development 5: Rosyth International Container Terminal deleted from the PNPF2 and for the PNPF2 to instead identify the need for a review of Scottish Ports Policy to inform the next NPF. We would also be happy to both provide written evidence, and also appear before the Committee if you would consider it helpful.

Charles G. Hammond
GROUP CHIEF EXECUTIVE

