

## SUBMISSION FROM MICHAEL CONNARTY MP

I share the concern of Forth Ports plc regarding the Proposed National Planning Framework 2 (PNPF2), laid before the Scottish Parliament on 12 December 2008 with regard to Scottish Ports Policy, containing a proposal for an additional container port at Rosyth. UK Ports Policy favours the incremental growth of existing ports as this is more sustainable in the long term than the creation of new facilities. (Modern Ports 2000, DETR and Ports Policy Review in England, Wales and Northern Ireland, Department of Transport, May 2006).

Forth Ports operates Scotland's largest container facility at Grangemouth, as well as the Port of Tilbury, London and has based its investment decisions on estimates of container traffic growth. I agree with their analysis that there is sufficient capacity to serve Scotland's container shipping needs on the east coast in the medium term. There are no capacity constraints in the current operation of the Port of Grangemouth. In the longer term, the operating capacity can also be increased through further investment as was shown by the recent 25 million expansion.

I dispute the assertion in PNPF2 that the need for a container facility for the Babcock property at Rosyth as a National Development is considered to have been proven. The process involved Scottish 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 flawed as it lacks both transparency and only considers a limited range of potential projects. The only supportive evidence that there is a need for a new container facility at Rosyth to service Scotland has come from the owner of the land at Rosyth. 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.

I support Forth Ports plc request that 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. I can see no imperative to create new port capacity at this time. In the event that there is a need for new capacity in the future, 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, e.g. depth of water, location in relation to the height restriction placed by the Forth Bridge and access to road and rail connections etc.

I support the proposal to delete the National Development 5: Rosyth International Container terminal from the PNPF2 and for the PNPF2 to propose the need for a review of Scottish Ports Policy to inform the next NPF.

I look forward to further consideration and discussion being given to this matter.

Michael Connarty MP

Linlithgow and East Falkirk Constituency