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Freepost RRHE-GBSA-BJLR,  
National Planning Framework Team,  
Scottish Government Planning Directorate,  
Area 2-H, Victoria Quay,  
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Dear Ms Kowalska

## **NATIONAL PLANNING FRAMEWORK FOR SCOTLAND 2: DISCUSSION DRAFT**

Thank you for consulting us on the latest National Planning Framework. The British Ports Association is the only forum for ports in Scotland and represents the overwhelming majority of port activity.

The draft Framework is fundamentally important to the development of transport and port infrastructure and we see it as an important stage in a fast changing field.

We are very encouraged to see, and very much support, the identification of three port projects within the nine projects identified as national developments; these are the Rosyth container terminal, the Scapa Flow transshipment facility and the Grangemouth freight hub. Equally, we were very encouraged to see the clear link made between the adequacy and success of transport infrastructure and sustainable economic development.

We agree with much of the analysis referring to ports in other parts of the Framework, which also goes some way to recognizing the various roles that ports in Scotland perform. Certainly there are clear opportunities, bearing in mind the presence of natural deep water in Scotland, to develop container traffic which, for the UK as a whole, is the fastest growing sector, closely followed by substantial expansion in ro-ro. Throughout the UK, both these sectors have been forecast to expand in the period up to 2030 by 3.5% and 2.8% respectively each year.

Ports are markedly different from other parts of the transport network in that their activities are almost entirely privately financed. As a result, they run the risk of isolation from full participation in planning and spending decisions on publicly funded transport infrastructure.

*The British Ports Association – Speaking for UK Ports*

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In this connection we see investment in better road connections as fundamental to the success of the Framework. We have submitted a list to Transport Scotland of much needed infrastructure developments which would improve efficiency in ports and in the transport network. The National Framework could reflect more clearly the need for this investment and indeed the high dependency on road connections evident throughout the ports sector, a dependence that is higher than anywhere else in the UK running at approximately 70% of all goods arriving at and departing from ports.

Investment in smaller, port related schemes represents good value for money, as identified in Rod Eddington's report published at the end of 2006. This made a particular point of underlining the value of links to ports, described as "the key gateways for UK trade". The report saw strong cost benefit ratios for investment in surface access to ports ranging between 3 and 15 a.

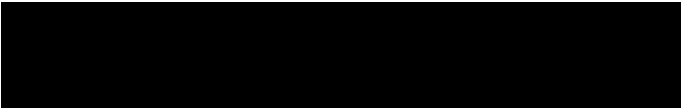
The final document might also emphasise more strongly the reliance of different parts of the Scottish economy on its ports bearing in mind that currently most of the references are to ro-ro and deep sea traffic. Ports supporting the offshore oil and gas and fishing industries are also dependent on good connections which require investment. In fact, the Scottish economy is unusually dependent on ports and maritime connected industries for its sustained success.

The document also raises (para 223) the issue of developing incentives for coastal traffic using the Freight Facilities and Water borne Freight grant schemes. Our experience is that these schemes are under subscribed, largely because of the difficulty of meeting all the criteria and guaranteeing reductions in road traffic. This raises the overall problem of how environmentally friendly modes can be encouraged and the sensitive issue of transport charging. It may be that local charging schemes could be trialled as a means of introducing traffic management and raising revenue to pay for improved infrastructure. We see this as an area of difficult decision making in the future but something the Scottish Government will need to address.

In conclusion, we very much support this draft Framework, its recognition of port projects and its more general recognition of the importance of ports and transport to the Scottish economy.

We look forward to taking it forward with the Scottish Government.

Yours sincerely



David Whitehead  
Director