

## Matter 3/South East England Regional Assembly



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## Matter 3: Regional Transport Strategy

### 3.1: How well does the RTS reflect and complement the proposed spatial strategy?

1. The RTS is an essential component of the South East Plan, and has played a crucial role in the development of the spatial strategy. As with all RPG9 partial reviews, the RTS published in July 2004 was a building block for the development of the South East Plan (Section B para 10.5). Having acknowledged their important role, the Regional Assembly has nevertheless taken the opportunity to review the policies within the RPG9 partial review as to its fitness for purpose. Due to the limited changes in terms of national policy, and the recent review date, there have been minimal changes proposed (see matter 3.3, 3.4 and 3.5). The new RTS contained as Section D4 within the South East Plan reflects and refines the framework as set out in the partial review.

The key themes developed and expressed in the RTS run throughout the Plan;

- the need to manage resources as well as investing in them;
- the need to promote behavioural change to support this approach;
- and the importance of concentration of development to aid in the creation of sustainable communities.

All are imbedded within the Plan as a whole, and reflected within the RTS. Indeed the development of spatial options included the use of the hubs highlighted in the partial review as a distribution option to aid the discussion on the appropriate balance of development across the region.

2. The partial review of RPG9 also established the principle of regional transport hubs as settlements where the provision of (or potential to provide) a range of multimodal transport services supports the concentration of land uses and economic activity. Policy CC8b evolves and applies this concept to the wider role of regional hubs, where the concentration of transport and economic opportunity assist in providing foci for development in the future. As such the RTS has, and will continue to, play an important part of the spatial strategy for the region as a whole in terms of supporting its wider policy aims and managing growth in an appropriate way.

### 3.2: Should the RTS include a more spatially specific policy on demand management in general, or road user charging in particular, having regard to the potential for raising new sources of revenue for transport schemes (Policy T6)?

1. The transport system will continue to experience intense pressure from rising demand for movement, driven in part by the consequences of past failure to properly integrate land use and transport planning. In this respect the focus within the South East Plan on development in urban areas, and in particular within the regional hubs, is fundamental to providing the opportunity for

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investment to be focused on rebalancing our use of the transport system in a way that reduces car dependence.

2. The publication of the RPG9 partial review in 2004 set out the principals of Mobility Management, which embraces the need to develop the transport system in a way that considers more positively the inter-relationship between all elements of the transport system and for this approach to be applied on a consistent basis across the region. Policies T4 and T5 in the draft South East Plan takes this policy one stage further by including the impacts of communications technology and public transport objectives within the Mobility Management umbrella. This provides a clear policy framework that capitalises on the opportunities created through the spatial strategy to adjust an individual's pattern of travel over time in a way that reduces car dependence. Mobility Management has provided strong policy guidance for the last round of Local Transport Plans and the core strategies of Local Development Frameworks enabling detailed policies and proposals to be developed that set out the appropriate balance between the various elements.
3. The draft South East Plan revised Implementation Plan clearly sets out the way in which all policies, can assist in delivering the overall aims of the Plan. In some cases this will result in the need to develop particular interventions to address particular issues, or the need to consider further how to address an issue. A more specific policy framework would run the risk of undermining the role of the Implementation Plan, and 'fix' the policy agenda for the Plan period, thus reducing its ability to react to changing circumstances.
4. With regards to the issue of charging for the purposes of this Public Examination a distinction needs to be made between the powers that already exist under the terms of the Transport Act 2000 in respect of cordon charging and workplace parking levies and the broader issue of national road user charging on which the Government has stated it will take a lead role in. With regards to cordon charging and workplace parking levies it must be borne in mind that it is for local transport authorities to determine whether or not these measures should be promoted. However, it is appropriate for the Plan to emphasise the potential benefits of such measures, as part of a wider package of measures promoted as part of Mobility Management and encourage authorities to fully explore this potential which it does through Policy T5 & T6.
5. The evidence base for the Plan acknowledges the potential significance of road user charging for the content of regional transport strategies and their delivery, a view supported by the outputs from a number of Multi Modal Studies, in particular ORBIT. The Regional Assembly believes that this is an issue on which leadership is necessary from the Secretary of State to ensure that there is a clear coordinated way forward.
6. Consideration in detail regarding the practical feasibility, and the spatial, environmental, economic and social implications both of area wide charging schemes and of a national charging scheme have yet to be thoroughly examined.

**3.3: Does the Plan given enough emphasis to freight, logistics and distribution (policies T10-T13)? Should there be greater specificity on the location of inter-modal freight interchanges (policy T13)?**

1. In preparing the transport policies set out in the Draft South East Plan there was a recognition that the freight policies would need to be the subject of further consideration (Section D4 para 1.33). The review suggests that they are largely fit for purpose in terms of defining the spatial planning context for freight in the region. This is not surprising given that the policies are themselves an evolution of the policies developed through the partial review of RPG9. However, several changes and updates to existing policies are proposed in order to ensure that freight, logistics and distribution issues are properly addressed. These are shown in detail in Annex A and explained further below.

POLICY T8: Parking

2. It is recommended that reference is made to the need to provide secure parking and stop over facilities for commercial vehicles on the strategic road network. Although the location of such facilities is a matter more appropriately considered at the local level, it is important that a strategic policy context for such facilities is provided in the South East Plan. The region's role as a gateway to the rest of the UK makes such provision particularly important and an issue of regional significance.

POLICY T10: Ports and Short Sea Shipping

3. The Assembly's response to the recent review of the national ports policy framework emphasised the importance of the region's gateway ports preparing Masterplans that shape the future of the individual port (see Annex B and Matter 3.4). A key part of the Masterplans is the consideration of the landside infrastructure requirements that provide the freight connections essential to enabling a port to operate efficiently. Accordingly it is recommended that the wording of Policy T10 is revised to address this issue.

POLICY T11: Freight Intermodal Gateways and Site Safeguarding

4. There are currently two policies in the Draft South East Plan that deal with the provision of intermodal facilities. The wording of the current Policy T11 on freight facilities provides an appropriate level of guidance at the regional level for ensuring the safeguarding of specific sites within Local Development Frameworks and other plans. It is therefore considered appropriate to retain the wording in its current form.
5. However it is proposed that Policy T13 should be deleted. The justification for this is two-fold. Firstly, the attempt to provide some indication of the locational criteria to be taken into consideration in identifying potential sites for an intermodal facility are already addressed in the wording of Policy T11. Indeed, the broader focus of Policy T11 is arguably more helpful in securing the mixture of freight facilities that are required to support the logistics industry in the region. Secondly, the Implementation Plan process is the most appropriate way

of identifying specific infrastructure requirements necessary to support intermodal facilities that are of regional significance.

### POLICY TCI: Development of Town Centres

6. The review's consideration of some of the broader issues associated with freight movements serves to emphasise the importance of ensuring that due account is given to the importance of access for deliveries within town centres. An explicit reference to this effect within Policy TCI emphasises the importance of this issue.

### Consideration of Wider Freight Issues

7. The review of freight policies, undertaken with support from the Freight Transport Association, has also given consideration to broader (non-spatial) issues associated with freight and the logistics industry. These issues will be developed further as part of the ongoing work to prepare a Regional Freight Strategy, expected to be finalised during 2007 following consultation.

### **3.4: Does the strategy provide an adequate framework for the development of ports bearing in mind the current Government review of ports policy (Policy T8)?**

1. Ports are of fundamental importance to the region and the country as a whole, handling around 95% of the country's trade by volume. The South East Plan recognises this critical role through the weight placed upon the gateway role of the region, and also recognises that the ports are reliant upon the quality of land infrastructure providing effective connections to markets.
2. The Ports Policy Review consultation document was published on the 23 May 2006 following the submission of the South East Plan to the Secretary of State. The forecasting work contained in the Review makes it clear that the Greater South East ports will continue to be the dominant ports for the future. This is based on a combination of geographic location in terms of global trade routes combined with the size and magnitude of existing capacity and infrastructure within the region.
3. The Assembly response to the consultation (Annex B) sets out that there is a need for a clear strategic planning framework at a national level that will enable the regional level to provide the context for achieving closer alignment of priorities for landside infrastructure with potential growth in port operations. Without this the planning system will continue to play 'catch up' reacting to individual proposals.
4. The framework should be developed in a way that compromises neither the integrity of the planning system nor the scope for the private sector to determine the need for investment in port infrastructure. Decisions on investment in landside infrastructure inevitably have an impact on the attractiveness and operation of individual ports, and the provision of a clear

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national strategic planning framework for the ports sector will help network operators to plan for changes in demand arising from intensification of operations within existing ports. It therefore follows that port owners/operators and statutory planning bodies should be able to plan for the future landside infrastructure needs of the strategic ports.

5. Matter 3.3 above highlights that the Regional Assembly has undertaken a Freight Policy Review, which has taken on board the Ports Policy Review Consultation Document and the Assembly's response. This has led to the Assembly proposing a change to Policy T10 (Annex A), so as to provide clarity on the role of gateway and regionally significant ports, and identifies Port Master Plans as an important means of identifying infrastructure requirements that supports the efficient operation of gateway ports.

### **3.5: Should the draft RTS have reflected to a greater extent the provisions of the Air Transport White Paper, particularly at Gatwick (Policy T9)?**

1. The Government published its White Paper on Aviation in December 2003– the Future of Aviation – following consultation on the South East and East of England Regional Air Services Study. The White Paper provides a national context for the development of airport capacity over the next 30 years.
2. The Regional Assembly has undertaken its own research on this vision. In light of this research it has serious concerns about the implication of the Aviation White Paper for the region. The very high levels of aviation traffic growth forecast in the White Paper, much higher than forecasts for other modes of transport, would require levels of development and surface movement which will be very difficult to accommodate, especially in the already congested, over-heated and polluted area around Heathrow. The research demonstrates that the environmental and social impact of a third runway and sixth terminal at Heathrow, and a second runway and third terminal at Gatwick, will be even greater than those set out in the Aviation White Paper.
3. The research also concludes that such scale of development would imply levels of emissions and other impacts that would be unacceptable to the Government's own national Sustainable Development Strategy, and its energy and transport policies. The Assembly therefore does not consider that at the present time it would be appropriate to include proposals for further expansion at either Heathrow or Gatwick in the Plan, beyond those already provided for under planning agreements.
4. The Government has an ongoing programme of work examining the environmental implications of further growth at Heathrow. This work will not be concluded until the latter part of 2006. On the basis that a decision on the way forward will require a further Ministerial decision to be made, the timing of which is uncertain, and that the implications of any such decision will impact only on the later stages of the Plan period, the South East Plan has been prepared on the basis of the current level of agreed growth at Heathrow and Gatwick. The

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situation will be reviewed in light of any future Ministerial decision, should one be made, or as part of the first review of the Plan, whichever comes first.

**CHANGES TO SOUTH EAST PLAN POLICIES ON FREIGHT  
 AGREED BY THE REGIONAL ASSEMBLY TO BE PUT FORWARD TO  
 THE EXAMINATION IN PUBLIC INTO THE SOUTH EAST PLAN**

**POLICY T7: PARKING**

Current Policy Wording	Changes	Reason for Change
<p>Local Development Documents and Local Transport Plans should, in combination:</p> <ul style="list-style-type: none"> <li>i Adopt restraint-based maximum levels of parking provision for non-residential developments, linked to an integrated programme of public transport and accessibility improvements</li> <li>ii Set maximum parking standards for BI land uses within the range 1:30 m<sup>2</sup> and 1:100m<sup>2</sup></li> <li>iii Set maximum parking standards for other non-residential land uses in line with PPG13, reducing provision below this in locations with good public transport</li> <li>iv Include policies and proposals for the management of the total parking stock within regional hubs that are consistent with these limits</li> <li>v Apply guidance set out in PPG3 on residential parking standards, reflecting local circumstances</li> <li>vi Support an increase in the provision in parking at rail stations where appropriate</li> <li>vii Ensure the provision of sufficient cycle parking at new developments including secure cycle storage for new flats and houses which lack garages.</li> </ul>	<p>Add new sub-paragraph:</p> <p><b><u>viii Ensure the provision of secured parking and stopover facilities for commercial vehicles at appropriate locations on the trunk road and motorway network.</u></b></p>	<p>Policy T7 does not currently make reference to parking facilities for commercial vehicles. The strategy needs to consider the growing need for lorry parking that is consistent with safety and security. There are a number of policy drivers, including implementation of the Working Time Directive.</p>

**POLICY T10: PORTS AND SHORT SEA SHIPPING**

Current Policy Wording	Changes	Reason for Change
<p>Relevant regional strategies, Local Development Documents and Local Transport Plans will include policies and proposals for land side infrastructure that maintains and enhances the role of the following ports:</p> <p>i Ro-ro – Dover, Channel Tunnel, Portsmouth, Newhaven, Ramsgate and Southampton</p> <p>ii ‘Niche’ markets – Southampton, Portsmouth, Shoreham, Newhaven, Dover and the Medway Ports</p> <p>iii Deep-sea containers – Southampton and Thamesport.</p> <p>Encouragement should be given to investment in landside infrastructure that supports short sea shipping connections linking the region into the wider European network via these ports.</p>	<p>Relevant regional strategies, Local Development Documents and Local Transport Plans will include policies and proposals for land side infrastructure that maintains and enhances the role of the following ports:</p> <p><b><del>i Ro-ro – Dover, Channel Tunnel, Portsmouth, Newhaven, Ramsgate and Southampton</del></b></p> <p><b><del>ii ‘Niche’ markets – Southampton, Portsmouth, Shoreham, Newhaven, Dover and the Medway Ports</del></b></p> <p><b><del>iii Deep-sea containers – Southampton and Thamesport.</del></b></p> <p><b><u>i Gateway Ports – Dover, Southampton, Portsmouth, Medway (Sheerness), Medway (Thamesport) and Port of London;</u></b></p> <p><b><u>ii Regionally Significant Ports – Newhaven, Ramsgate and Shoreham.</u></b></p> <p><b>The Gateway Ports should give priority to the preparation of Port Masterplans as a means of identifying future landside infrastructure requirements</b></p> <p>Encouragement should be given to investment in landside infrastructure that supports short sea shipping connections linking the region into the wider European network via these ports.</p>	<p>To provide clarity on the role of Port Masterplans in as a means of identifying infrastructure requirements that supports the efficient operation of gateway ports.</p>

**POLICY T11: FREIGHT INTERMODAL GATEWAYS AND SITE SAFEGUARDING**

Current Policy Wording	Changes	Reason for Change
<p>Relevant regional strategies, Local Development Documents and Local Transport Plans should include policies and proposals that:</p> <ul style="list-style-type: none"> <li>i Safeguard wharves, depots and other sites that are, or could be, critical in developing the capability of the transport system to move freight, particularly by rail or water</li> <li>ii Safeguard and promote sites adjacent to railways, ports and rivers for developments, particularly new intermodal facilities and rail connected industry and warehousing, that are likely to maximise freight movement by rail or water</li> <li>iii Encourage development with a high generation of freight and/or commercial movements to be located close to intermodal facilities, rail freight facilities, or ports and wharves.</li> </ul>	<p>No change proposed</p>	<p>The spatial and modal criteria set out within the existing policy provide an appropriate level of detail for the identification of regionally significant freight intermodal gateways.</p>

**POLICY T12: RAIL FREIGHT**

Current Policy Wording	Changes	Reason for Change
<p>The railway system should be developed to carry an increasing share of freight movements. Priority should be given in other relevant regional strategies, Local Development Documents, and Local Transport Plans, providing enhanced capacity for the movement of freight by rail on the following corridors:</p> <ul style="list-style-type: none"> <li>i Southampton to West Midlands</li> <li>ii Dover / Channel Tunnel to and through/around London</li> <li>iii Great Western Main Line</li> <li>iv Portsmouth to Southampton / West Midlands.</li> </ul>	<p>No change proposed</p>	

**POLICY T13: INTER-MODAL INTERCHANGES**

Current Policy Wording	Changes	Reason for Change
<p>The Regional Assembly should work jointly with DFT Rail and Network Rail, Strategic Rail Authority, Highways Agency, Freight Transport Association, and local authorities, to identify broad locations within the region for up to three Intermodal interchange facilities. These facilities should be well related to:</p> <ul style="list-style-type: none"> <li>i Located in proximity to rail and road corridors capable of accommodating the anticipated level of freight movements;</li> <li>ii The proposed markets;</li> <li>iii London.</li> </ul>	<p>To be deleted</p>	<p>The spatial and modal criteria set out within Policy T11 provide an appropriate level of detail for the identification of regionally significant freight inter modal gateways.</p>

**POLICY TCI: DEVELOPMENT OF TOWN CENTRES**

Current Policy Wording	Changes	Reason for Change
<p>Accessible, attractive and vibrant town centres are fundamental to the sustainable development of South East England and will continue to be the focal point for development of a mixture of uses including leisure, services, retail, residential and commercial. A network of town centres will be promoted to create a sustainable distribution of facilities across the region. In appropriate cases, LDDs will seek to promote good quality development where it is desirable to regenerate and renew town centres. They will ensure that centres are accessible by public transport.</p>	<p>Accessible, attractive and vibrant town centres are fundamental to the sustainable development of South East England and will continue to be the focal point for development of a mixture of uses including leisure, services, retail, residential and commercial. A network of town centres will be promoted to create a sustainable distribution of facilities across the region. In appropriate cases, LDDs will seek to promote good quality development where it is desirable to regenerate and renew town centres. They will ensure that centres are accessible by public transport. <b><u>by freight traffic for deliveries to businesses.</u></b></p>	<p>The role of freight in supporting the economic health of Town Centres should be made explicit.</p>

## **COPY OF RESPONSE TO DEPARTMENT FOR TRANSPORT PORTS POLICY REVIEW CONSULTATION**

### **1. Introduction**

- 1.1 The Government's current policy has failed the ports sector, and by association impacted negatively on the performance of the UK economy by :
- Providing little or no national framework for port development across the country, leading to decisions being made on a case by case basis, and
  - Missing the opportunity to develop the landside infrastructure within a national framework for port development, and hence relying upon little or no forward planning for landside infrastructure.
- 1.2 This response concentrates on these issues at the strategic level and in particular how the interface between the ports industry, national policy and the spatial planning framework can be improved.

### **2. Forecasts**

- 2.1 Forecasting port demand is in itself a difficult task. There are numerous variables all of which can impact on the overall outcome and this is appreciated. What is clear, however, is that the demands for port capacity will remain high, particularly with regards to capacity for deep-sea services. The ports in the Greater South East (GSE) are likely to continue to be the dominant ports in terms of meeting the needs of the UK due to their geographic location and the markets they serve.
- 2.2 One aspect of forecasting that requires further consideration, and which has yet to be factored properly into them, is that of increased efficiency particularly in respect of facilities for deep sea containers. At present the forecasts for capacity of these facilities appear to be based solely upon a fixed relationship between quayside and port capacity. There is increasing evidence available that suggests this assumption is fundamentally flawed. The National Ports Policy should emphasise the importance of pursuing increases in efficiency of existing port facilities, over and above expansion of facilities either within existing ports or as new ports.
- 2.3 The analysis in respect of the potential for the cruise and passenger ferry sectors is supported however the National Ports Policy should acknowledge that these sectors may give rise to more localised impacts that in themselves are significant.

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- 2.4 The Government is urged to review its current approach to intensification of existing sites. Further consideration must be given as to how this may impact upon the forecasts which provide the evidence base for the Review, and how this may interface with colleagues in the Department for Communities and Local Government. However it is acknowledged that any adjustment in the forecasting methodology is likely to simply delay the need for increases in port capacity rather than obviate their need in the future.

### **3. Regional Balance**

- 3.1 The distribution of current ports is based upon a combination of geographic location in terms of global trade routes and/or minimising crossing times to mainland Europe. The Board supports the view that operators of deep-sea shipping services are particularly reluctant to make direct calls outside the GSE, as this adds substantially to voyage time and hence shipment costs. Due to the nature of the industry additional costs incurred to shippers is a major determinant of port of call.
- 3.2 The Review poses the question as to whether the national PSA on reducing the gap in economic performance between the northern and southern regions should be used as a basis for determining the National Ports Policy. Based on its own evidence, the Review demonstrates that an attempt to use public sector policy on ports in this way will not be successful. The modelling work set out in the supporting documentation to the Review clearly shows that if port capacity is not provided in the GSE operators of deep-sea shipping services will switch to using mainland Europe ports rather than alternatives elsewhere in the UK.
- 3.3 Thus while port facilities might be seen as possible economic regeneration tools, the operation of existing and future markets are likely to undermine any attempt by the public sector to intervene in this way. We therefore support the conclusion set out in the Review that an attempt by the public sector to intervene by promoting additional port capacity in the north of the country against the clear market drive for capacity in the south runs the risk of over crowding ports in the GSE. This would ultimately increase the pressure on landside infrastructure, giving rise to increased costs of distribution which in themselves will have an adverse impact on the UK economy as a whole.
- 3.4 The National Ports Policy must therefore acknowledge the critical role of the ports in the GSE in serving the whole of the UK economy. The acknowledgement of this role should in turn be reflected in the allocation of public sector funds to invest in landside infrastructure serving the gateway ports in the GSE.

### 4. Clarity of Planning Framework

- 4.1 Regional Spatial Strategies provide the statutory planning framework within which the development of port facilities and their supporting landside infrastructure are identified. The lack of a clear strategic planning framework at the national level means that the Regional Planning Bodies are required to undertake their statutory role in a partial policy vacuum. The National Ports Policy should provide the strategic planning framework.
- 4.2 It should set out the broad direction and quantum of port capacity needed to be catered for over a period of time on a regional basis. Where practical this should be broken down into broad areas. This would not be a target drive approach, but would provide greater clarity on which Regional Planning Bodies could then take forward the development of Regional Spatial Strategies.
- 4.3 Such a framework would provide the basis for a positive dialogue between the port owners/operators and Regional Planning Bodies. One that would enable the principles underpinning the need for expansion of port facilities to be established at an early stage in the planning process. This would in turn provide port owners/operators with greater certainty and clarity in taking forward proposals to develop their existing facilities. It would also provide the opportunity for the Regional Planning Bodies to achieve closer alignment of priorities for landside infrastructure with the potential for growth in port operations.
- 4.4 The combined effect of this approach would be to support the efficient and effective operation of ports as international gateways through timely investment in landside infrastructure. By introducing certainty and clarity to the delivery of major investment in port infrastructure such an approach would have the added benefit of reducing the time taken to deliver investment in port infrastructure.
- 4.5 The National Ports Policy should require strategic ports to prepare a Port Master Plan as a means of reinforcing the need for a closer dialogue between port owners/operators and the planning authorities. Experience with the preparation of the Port of Dover Master Plan has been extremely positive. It provides a clear basis on which the Regional Planning Body has been able to engage in discussion with the Port as to how to ensure the landside infrastructure needs to be developed in response to increases in throughput through the port. The Master Plan provides a flexible framework within which detailed proposals can be brought forward in response to changes in market conditions. It also provides a framework within which it is possible to begin to identify the apportionment of costs for investment in landside infrastructure between public and private sectors.
- 4.6 In terms of ports within South East England the mandatory requirement to produce a Port Master Plan should only be made of the major ports, namely

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Southampton, Portsmouth, Thamesport and Dover. There may be a case for other ports, or groups of ports, of sub-regional significance to also produce Master Plans, especially where this can assist with particular issues for the port or the area in which it is located. However this is likely to be a voluntary decision by the port rather than a requirement.

- 4.7 The Review should give further consideration as to how the issue of intensification of existing port facilities is taken into consideration as part of the planning system. The National Ports Policy should emphasise the importance of extending the “manage and invest” approach that underpins the Regional Transport Strategy to the area of ports policy.

### **5. Land Side Infrastructure**

- 5.1 The issue of land side infrastructure provision to support and enable ports to continue to operate is one of national importance. The absence of sufficient capacity in both road and rail links connecting major ports will have serious repercussions not only for local communities, but also for the UK economy as a whole.
- 5.2 The wider economic benefits of efficient and effective port operations should be reflected in the allocation of public sector funds to support investment in landside infrastructure. In particular the National Ports Policy should provide the basis for increasing the amount of funding available to authorities within the GSE to invest in landside infrastructure supporting the role of the major ports as international gateways.
- 5.3 The Review should give further consideration as to whether current appraisal techniques give sufficient weight to the wider economic benefit of investment in landside infrastructure supporting port activities.
- 5.4 We support the view that planning applications for port development should be treated in the same way as any other development. In particular the principle that a port developer should contribute to the cost of any consequential landside infrastructure needs to be explicitly acknowledged. However there may be scope to explore innovative ways in which such a contribution is made. For example capital investment in enhanced capacity for freight movements by rail might be reflected in reduced freight access charges for movements whose origin/destination is the proposed port facility.
- 5.5 The Review should give further consideration as to how the need for investment in additional landside infrastructure arising from intensification of port operations is funded.

**6. Transhipment**

- 6.1 The Review appears to down play the role of Short Sea Shipping and the potential for Motorways of the Sea to be developed. The current UK policy of non market interference is resulting in a barrier to pursuing funding opportunities through TENS which would enable port operators to bring forward facilities that support such services.
- 6.2 By providing a clear strategic planning framework at a national level, the National Ports Policy should provide the basis for the UK to engage proactively with partners in Member States with a view to realising the full potential of shipping as part of an integrated transport system. The approach followed by other Member States has focused on identifying sections of the coastline which should be afforded a high priority for the development of facilities that support Short Sea Shipping services as part of the Motorway of the Seas concept. This would not involve the identification of specific ports. For example such a relationship could be between South Coast ports and those on the Iberian coast. This approach would enable partnerships to form that do not distort the market, but which provide an avenue to gaining access to investment through European funding streams that would support the development of shipping services.
- 6.3 There is undoubtedly some potential to reduce the pressure on landside infrastructure in the GSE through the use of transhipment services operating along the UK coast. At present there is no apparent advantage for the logistics industry to develop such services. The National Ports Policy provides the opportunity to take forward such an initiative possibly supported via a time limited Cost Neutral Revenue Support system, similar to that for rail, which may assist in pump priming.

**7. Environment**

- 7.1 Regional Planning Bodies and local planning authorities are required to undertake an appropriate assessment of the effects of development plans (including RSS) on Natura 200 sites. This must include an assessment of the in-combination effects of other plans and projects. In addition to the potential effects of dredging operations on Natura 2000 sites, other potential impacts of ports operations need to be considered. For example the potential effect of emissions from shipping to air and the impacts of this on sensitive terrestrial habitats. The Review should acknowledge and provide guidance on the consideration of these wider impacts and the implications for assessment of in-combination effects.

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