

The Bristol Port Company

Issue 3 Item h

Wednesday, 14 December 2011

Examination into the

**NORTH SOMERSET COUNCIL DRAFT CORE
STRATEGY DEVELOPMENT PLAN DOCUMENT
(JANUARY 2011)**

December 2011

Position Statement of The Bristol Port Company

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INTRODUCTION

1. This submission is made on behalf of First Corporate Shipping Limited trading as The Bristol Port Company (TBPC) and comments specifically on Policy CS24 in respect of the “appropriateness of provision” for Royal Portbury Dock (RPD). (Hearing Issue 3h)
2. This Statement briefly outlines the Port, its trade and development over recent years and proposals to further development. It identifies the Port’s role, the relevance of such to the Core Strategy and to deal with some of the issues raised by that Strategy.
3. The main issue to which these representations relate are to ensure that the role of RPD, its activities, changing patterns of trade and importance as a source of employment is recognised and due allowance is made for future growth and change through:
 - a) meeting the strategic needs of the site as recognised in planning policy documents including the draft Regional Spatial Strategy 2008 (RSS), the former Avon Structure Plan and the planning policies of North Somerset Council and the recently issued National Policy Statement for Ports (NPS – October 2011)
 - b) realising fully the potential of Bristol Port
4. As relevant to the text several Appendices are attached illustrating and providing further information.

THE BRISTOL PORT

5. Bristol has been a port city since the 13th century. Responding to an ever increasing growth in commercial ship size the original harbour in the city centre was supplemented in the 19th century by the development of a new port at the mouth of the River Avon known as Avonmouth. In the 20th century those pressures on ship size continued and new facilities on the south side of the confluence of the Avon with the Severn Estuary were promoted by Bristol City Council through the West Dock Act (1973) with the port opening in 1979. It is Avonmouth and RPD that now essentially represent the commercial port of Bristol, comprising some 1,000 ha. (2,500acs). (Appendix 1.)
6. Bristol Port, whilst being two physical entities separated by the River Avon, is run as a single port. There is one dedicated link between them (a coal conveyor belt which runs under the River Avon), but all other intra-port movements take place via the M5 Avon Motorway Bridge.
7. The port was owned, developed and managed by Bristol City Council until 1991 when it was acquired by First Corporate Shipping trading as The Bristol Port Company. The port remains an independent, privately owned business and is regarded in the port industry as a leader in productivity and innovation.
8. As the more modern port RPD is capable of accommodating ships up to approximately 130,000 tonnes with the older Avonmouth Docks having a 35,000

tonnes capacity. The Avonmouth part of Bristol Port is within Bristol City Council's curtilage with RPD being totally within North Somerset Council. In the context of this submission Bristol Port should be taken as the whole of the Port's estate although given the remit of this Examination attention is focussed on RPD.

9. Bristol Port is basically a general port handling a diverse range of mainly imported cargoes. These include fuels (coal, oils and aviation fuel), vehicles, bulk cargoes including fertiliser and grain derivatives, forest products and metals, and containers. (The plan in Appendix 2 shows the layout and main uses of the two ports at RPD and Avonmouth). Since privatisation cargo tonnage has trebled.
10. The composition of trade fluctuates over relatively broad timescales with new trades developing e.g. the importation of biomass products to supply energy plants, three of which will be local, and older trades diminishing e.g. coal.
11. The growth has been facilitated by a substantial capital expenditure programme which has been sustained throughout the last 20 years. More than £431 million having been invested privately on construction of port facilities, buildings, and infrastructure and associated works, dramatically altering the landscape of the dock estate.
12. As the development of first Avonmouth and more latterly RPD represented a response to the increasing size of ships so the Harbour Revision Order submitted in mid 2008 represented a response to the need to cater for the large container ships being built to meet the requirements of globalised trade in the 21st century. The Bristol Deep Sea Container Terminal (BDSCT), to be constructed on the foreshore at Avonmouth Docks, was granted permission in March 2010 and will provide a modern port facility unencumbered by lock gates. This new container terminal, costing an estimated £700 million, will be able to handle the largest container ships being built, enhancing the ports capacity by some 1.5 million teu (twenty foot equivalent unit - standard measure of container volume) per annum (Appendix 3.)
13. Since permission was granted further technical preparations have been undertaken but the timing of the next stage of development will be determined by the international economic position and investors' appetite for investing in new container terminal capacity in the developed world. TBPC has made it clear that the development of the DSCT will be a joint venture and with a decline in world trade and the earlier lack of UK container handling capacity having evaporated, in part due to new port development (e.g. Felixstowe, London Gateway,) progress on the Bristol project will be delayed. However, on the basis that growth will resume in the future, as assumed in the NPSP, Bristol Port will be able to react promptly as new container capacity is required.

THE ROLE OF BRISTOL PORT.

14. Bristol Port is ranked in the top ten of general commercial ports in the UK and for much of the last decade has been the fastest growing port in the country. Whilst this status in part reflects the investment into modernising the port's infrastructure, including reopening the redundant rail link to RPD, much is also owed to its unrivalled geographical advantage and transport links.

15. Located on the Severn Estuary, Bristol is the largest “inland” port in the UK which, together with very good road and rail links, gives it quality access to much of the country. (This is demonstrated by the maps and figures in Appendix 4.) It is the quality of this access, together with changes in world trade, which has encouraged the development of a new container terminal.
16. Nationally the port plays a major strategic role in supplying key industries – notably energy, car distribution and agricultural industries – and supports a range of others including food and drink and manufacturing through a supply of timber, minerals and metals etc.
17. Regionally the Bristol Port is the largest commercial port in the South West; a role it also fulfils within the Severn Estuary. Trading patterns are difficult to quantify but linkages to the region are expressed through such trades as animal feedstuffs and fresh fruit and vegetables with Asda, the Co-op, and Tesco as major retail customers
18. At the sub-regional level, West of England, work undertaken by Roger Tym & Partners (2008) for the Environmental Impact Assessment to accompany the Port’s Harbour Revision Order for the Deep Sea Container noted that the port employed some 600 people of which 91% lived within the Greater Bristol area, including North Somerset. (The port is a major provider of permanent, skilled, blue-collar employment opportunities with its own training programmes needed to satisfy the specialist handling requirements of some of its trade and adding value to onward dispatch.) Tym estimated there to be some 20,600 jobs in the immediate area of the port of which 2,280 will be port specific or port tenants and a further 10,000 port related.
19. The Tym analysis suggests that the BDSCT would create some 540 new full time equivalent construction jobs and in respect of operational employment the economic benefits to the Bristol region short term could be the creation of between 1,580 and 1,660 jobs adding some £53 million (gross) to the Gross Value Added (GVA) of the Bristol sub-region. In the medium term (2026) the port is expected to support some 7,900 jobs with an additional £410 million added to the local economy. By 2050 these figures could be 8,600 jobs and £730 million. (Appendix 5 - relevant chapter from the Environment Statement.)
20. Bristol Port itself has seen considerable change in character over the past 20 years. For long it served the sub-region’s heavy industry (ICI Chemicals, Rhodia, Philblack/Sevalco etc.) the decline of which has reflected those of the nation as a whole. But other sectors have recognised the locational advantages of improved motorway links to the national network, including three bridges two spanning the Severn Estuary and one the River Avon, a by-pass to Avonmouth village enhancing local accessibility, re-established rail links to RPD and a reactivated port and since 1991 the area has been reinvented as a logistics centre benefitting from its geographical location, quality accessibility, and globalisation of trade. RPD has been a beneficiary of the locality being exploited by the logistics industry e.g. Asda regional warehouse, car importers, etc.

BRISTOL PORT AND THE CORE STRATEGY

21. TBPC's position is to seek to maximise the potential of RPD. As one of the most modern port facilities in the UK with the locational advantages referred to above the port can continue to make a major contribution to the national and regional economy as well as the UK port infrastructure explicitly recognised in the NPSP. The delay in constructing the DSCT effectively means that RPD will continue in the short to medium term to provide the major deep water port handling facility in the Bristol Docks complex. As such it is essential to ensure that the port's ability to evolve is not impaired.
22. In respect of this role TBPC are satisfied that NSC recognise this in the Core Strategy where they acknowledge at paragraph 1.18 that the port is of regional importance. This support is reciprocated by TBPC in its support of NSC developing a "prosperous economy" (para. 2.3) and the Company, as a major stake-holder in the locality, welcomes consultation on relevant economic matters (para. 2.5). However, not surprisingly, there are tensions within and between the objectives and policies that seek to realise a prosperous economy that potentially go to the soundness of the strategy.

Green Belt

23. As the more modern sector of Bristol Port, and given the likely delay to the construction of the DSCT, RPD will continue to be of major importance and the focus of growth and change. In respect of this TBPC is satisfied that "*The role of Royal Portbury Dock will be maintained and enhanced*" (Policy CS24) but the Company is concerned that beyond the land identified at Court House Farm and "*.....any requirement that might be identified in some future Site Allocations DPD no further expansion of the Port will be supported.*" This curtailment relates largely to RPD and the Green Belt and immediately identifies a policy tension, notwithstanding CS24 is seen as contributing towards Priority Objective 3 "*Support and promote major employers in North Somerset such as... .. Royal Portbury Dock, to ensure continued employment security and economic prosperity.*"
24. The policy and priority objective are clearly compatible with Government policy as featured in the Draft NPPF, the relevant planning section of the Budget Statement (March 2011) and the NPSP. In order that this policy tension is addressed TBPC seeks a major review of the Bristol and Bath Green Belt particularly that part that relates to North Somerset. It is considered that strict adherence to the current Green Belt could be counter-productive to economic growth over the next 15 years.
25. TBPC has sought over the past 12 years to ensure that scope for its growth was respected through court challenges both in European and the UK and through planning applications and appeals. This concern is not new, being raised at the first Avon Structure Plan EIP in 1982 where the DTI expressed concerns that the Green Belt should not be extended to threaten the future prosperity of the then West Dock. This Green Belt threat was finally enacted in the North Somerset Replacement Local Plan (March 2007) with only minor adjustments to take account of potential port expansion. This adjustment, releasing some 31.6ha.(78

acs) of land, was proposed by NSC at the Local Plan Inquiry, accepted as a formal modification by the Inspector, and initially agreed by NSC only for 15 ha (37 acs.) of the land to be removed from Green Belt to be rescinded. (Appendix 6.)

26. Thus, given the time horizon of the Core Strategy and the time that has elapsed since the Green Belt in the Bristol-Bath area was last comprehensively reviewed, TBPC seeks this to be remedied as an integral part of the Strategy. This would then permit an up-to-date context for the balance to be considered between the categorical statement embodied in CS6 that “.....no further Green Belt amendment is proposed” and that “Further expansion of the Port within North Somerset is not supported” (CS24) with the stated “support for a prosperous economy” and the “.....role of Royal Portbury Dock will be maintained and enhanced” also CS24. There is contradiction within Policy CS24 and between it and other policies in the Core Strategy as well as a failure to comply with the draft NPPS and NPSP. As such it is contended that Policy CS24 is unsound.

Freight Movement and The Bristol – Portishead Rail Link

27. On the NSC long time ambition to reopen the Bristol – Portishead rail link for passenger traffic TBPC has its own long held position. The rail link, abandoned in the 1960s, deteriorated into various levels of physical decay. In the late 1990s TBPC sought to reinstate the railway for freight use as far as Easton-in - Gordano/Pill and beyond to install a new branch line leading to RPD. Conditional permission was obtained in 2000 for that part of the branch line between Pill and the port estate, and the reinstated link between the port and the main line in Bristol opened late 2001. The remainder of the line, continuing on to Portishead, remains in a serious state of decay and in part is overlain by a cycle track.
28. TBPC has recently sought planning permission to modify Condition 16 of the planning permission. This condition, which limited the number of freight movements, is now seen as potentially prohibiting the opportunity to accommodate a greater proportion of the changing freight requirements to be transported by rail. This in turn will help ensure there will be no increase in road freight traffic movements through Junction 19 of the M5 as the port trade increases.
29. TBPC appreciates the long standing support for the reinstating of a passenger service on the Bristol – Portishead rail link and the Company is satisfied provided the movement of freight traffic is not impeded. Network Rail’s positive response to the relaxation of condition 16 further emphasises that the increase in frequency of freight trains on this rail link is “..... fundamental to the future implementation for the Portishead Passenger Services should that funding become available” by spreading the cost of line maintenance.
30. On the whole issue of freight movement the Core Strategy is silent (Policy CS10) and this failure means that in any need to strike a balance between competing policy priority freight traffic goes unrecognised. This is a deficiency as it represents a failure to acknowledge the increasing national importance of the logistics industry and the role it plays in the globalised economy in which the UK operates.

31. Thus in Policy CS10 TBPC wishes to see inserted specific reference to the movement of freight, a recognition of its role in the “prosperous economy” sought in North Somerset and in respect to CS10 4) dealing with the reopening of the Bristol – Portishead rail line a caveat that any passenger service (rail or guided bus) is compatible with freight movement. It is considered that such flexibility is necessary as freight paths on the general rail network are so limited and controlled that allocated slots cannot be disregarded.

Policy Deliverance

32. The Government has issued the NPSP (and as with the draft NPPF and Budget Statement) continues to encourage the long term growth originally envisaged in the earlier draft. The overall thrust is again to leave market forces within the port industry to determine when and where development takes place. Ports are seen as being able to make major contributions to promoting sustainable economic development, both nationally and regionally, and supporting off-shore wind energy; both sectors to which Bristol Port contributes.
33. In respect of delivering a “prosperous economy” the Core Strategy makes two points pertinent to the Bristol Port upon which comment is made and clarity is sought.
34. In the Sustainability Appraisal Non-Technical Summary there is a reference to *“Major development at the Port... ..will also be assessed through subsequent planning documents”* without any clarification as to what these documents might be. In paragraph 3.299 of the Core Strategy, dealing with “delivering a prosperous economy” reference is made to the future of the port being the owner’s responsibility but that NSC will seek the preparation of a Port Masterplan covering the whole of the Port of Bristol.
35. The previous Government issued draft guidance on Port Masterplans and consulted on a Ports Policy. A substantial evidence base on the Bristol port was assembled as part of the Harbour Revision Order by which the development of the DSCT was pursued and could be useful for any masterplan exercise. However, TBPC had considerable concerns about the concept of port masterplans as presented in the Government guidance and from a few examples available to date. The port industry is a highly competitive industry in which longer term investment has to be balanced with constantly changing dynamic trading patterns. Taking account of such conflicting factors and dynamism it is considered that the Guidance proffered on port masterplans is of limited value and alternative approaches are being explored.

CONCLUSION

35. To summarise, The Bristol Port Company is seeking:
- To support NSC in its endeavour to create a “prosperous” economy.
 - That the Core Strategy continues to recognises the strategic nature of the Bristol Port, in which RPD has an important role in the future with policy