



04 February 2022

National Infrastructure Commission  
Finlaison House  
15-17 Furnival Street London, EC4A 1AB

Dear Sir/Madam

### **British Ports Association: Response to NIA2 Call for Evidence**

The British Ports Association (BPA) is the national association for ports, harbours and terminals, speaking for over 100 port authorities who own and operate over 400 port facilities. We represent the interests of a diverse group of ports to all tiers of government. Our membership accounts for 86% of all tonnage and handle 85% of all vessel arrivals.

The BPA also represents 46 of the top 50 major ports, all the UK's main energy and passenger gateways, 19 of the busiest 20 fishing ports and an extensive network of ports and harbours that facilitate over one million leisure craft and yachts each year.

The ports industry plays a vital role in our economy, handling over 95% of the UK's international trade. The sector provides important hubs of regional and nationally significant economic activity and employment, often in areas of deprivation. The UK's departure from the EU has created a fresh impetus for a new and innovative growth-generating policy in our coastal communities and British ports have the potential to become manufacturing and trading powerhouses, given the right policy incentives.

Separately we are members of the sector umbrella group Maritime UK and have been working closely with them on a broader maritime submission. Although Maritime UK's submission will cover ports generally, we are making this in addition to cover some specific suggestions in respect of our sector.

### **We are asking Government to provide:**

- **Transport:** Government to deliver on the recommendations of the Department for Transport's Port Connectivity Study. Funding for local authorities to better manage and maintain critical last mile connections to ports. Replacement of the European Maritime Fisheries Fund (EMFF).
- **Infrastructure:** A multi-year green maritime fund to support the specific and significant challenges to meet the sector's decarbonisation and environmental commitments as part of a wider £1bn maritime decarbonisation programme. A UK Infrastructure Bank to provide consistent credit and anchor investments.
- **Planning:** Review of port planning and consenting regimes. Grant access for all ports to a new planning regime, regardless of Freeport status. Extension of Capital Allowances for port infrastructure.
- **Innovation:** Continued support from Government to achieve 'Maritime 2050' targets.

- **A supportive and enabling regulatory system:** licensing authorities and regulators must have the resources they need to function effectively. This is key to enabling sustainable development.

**Industry will provide in return:**

- Hubs of economic activity, jobs and investment in port regions around our coastline
- An efficient, market-led ports sector responsive to users and contributing to the economy
- A responsible industry which strives to minimise environmental impacts
- Information to regional and national planners about how to stimulate maritime activity
- Modern infrastructure and facilities for the UK's international trade, offshore fuel and energy generation, maritime and shipping services, marine tourism and recreation, as well as hubs for the fishing industry
- A network of responsible UK anchored companies committed to their businesses
- High standards of marine and landside safety
- Skilled jobs and a well-qualified and trained workforce
- The BPA to provide governance and safety briefings to ports and duty holders and to support the work of Port Skills and Safety in driving up standards across the sector

Ports of all type and size are usually hubs for their locations and often regions. It might be for trade, business, energy, tourism or recreational activities but they form the central pillar on which economic activity is either supported or routed, both historically and moving forward. They, therefore, need to be connected.

It is key that the value of spending on transport is recognised within this review. With very few exceptions, UK port infrastructure investments are privately financed. Port investments are market-led and at present, we estimate that in the region of £1.7bn worth of port projects are in the pipeline and could be completed in the next three years. In terms of infrastructure, ports ask for very little from the Government, but they do rely on modern transport infrastructure. This is sometimes subject to competing demands, for example between passenger and freight-based projects.

Our request to Government is to increase transport investment to help the UK ports and logistics industries compete with international competitors and drive regional economies. At a very general level most freight is transported on roads and investment in our strategic trunk roads is a must. There should also be mechanisms for Government to allocate additional funding to Local Enterprise Partnerships (in England) and the enterprise bodies elsewhere, should their budgets become exhausted.

An important consideration of public infrastructure funding decisions is the cost-benefit ratios for investment. Although produced some time ago, one of the conclusions of the Eddington Report commissioned by the DfT in 2006 is, we believe, still very relevant in that it identified strong cost-benefit ratios for investment in access to ports which they assessed translated into positive GDP benefits and represented good value for money.

We have also been pressing the Government to prioritise freight transport infrastructure and particular challenges such as 'last mile' connections to ports. These minor roads that connect ports to the wider strategic network are often the responsibility of local authorities. However, since 2010, as a result of receiving significantly less money from central government, councils' spending on highways and transport fell by 40% - from £121 per person to £72 per person. This

has resulted in poorly maintained local road networks that disrupt freight journeys and the national economy is losing out.

According to an estimate conducted for the BPA by MDS Transmodal, between 80-85% of landside UK port freight enters and leaves ports by road. This is a consequence of our geography, an import and service-led economy and the UK's proximity to major European freight hubs. This means road investment should be prioritised. Though, where possible and appropriate, we value investment in rail freight capacity, especially since this can significantly reduce congestion on the road network.

We thank you for the opportunity to respond and we would be pleased to provide evidence in person.

George Finch  
Policy & Economic Analyst  
British Ports Association  
[George.finch@britishports.org.uk](mailto:George.finch@britishports.org.uk)