

Emailed to:

Freeports@trade.gov.uk

Monday 13 July 2020

To whom it may concern,

Transport for the South East response to the Freeports Consultation

I am writing to you as Lead Officer for Transport for the South East (TfSE) to provide a response to the Government's freeports consultation.

Transport for the South East (TfSE) is a sub-national transport body (STB), which represents sixteen local transport authorities. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. These authorities are represented on the Shadow Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, Highways England, Network Rail and Transport for London.

TfSE provides a single voice from across its geography on the transport interventions needed to support growth. The South East is crucial to the UK economy and is the nation's major international gateway for people and business with some of the largest ports and airports in the country. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

The TfSE area, encompasses five Local Enterprise Partnerships who are key in driving the economy across the region. They are responding to this consultation individually highlighting the potential economic benefits and impacts that freeports could offer in detail. However, TfSE also recognises that freeports could support economic growth in the region and wider UK and they could potentially form part of the economic recovery from Covid-19 and boost trade and industry once the United Kingdom leaves the transition period from the European Union. We have strong exporting figures for the region as businesses in the South East have good access to international gateways. Although the South East is a relatively prosperous region (it has the second highest GVA per capita of all the UK regions and nations (second only to London)), there are significant pockets of deprivation across the South East area. Many coastal communities in particular contain areas with high levels of deprivation. The introduction of freeports could help support job creation and regeneration in these deprived areas.

Individual sea and airport operators from across the region will be responding to the consultation directly and although TfSE is not in a position to comment on many of the operational aspects of the freeports consultation, we feel it is important to comment on the aspects relating to planning and surface access. As an STB, our principal role is to identify the strategic transport interventions required to facilitate sustainable economic growth in our area through the development of our 30-year

transport strategy a copy of which can be found here:
(<https://transportforthesoutheast.org.uk/transport-strategy/>).

Whilst TfSE considers that it is important to facilitate improved connectivity to our international gateways (and any future freeports), this needs to be undertaken in ways that minimise any adverse impacts on the environment and local communities. The 2050 Vision underpinning our transport strategy sets out our ambition to achieve net zero-carbon emissions by the year 2050 at the latest. Road transport is a leading source of carbon emissions and it is imperative that the creation of a freeport does not counteract the efforts of local authorities and central government to improve air quality and achieve net-zero carbon emissions. TfSE would expect that in developing any proposals for a freeport, due regard will be given to the environmental impacts it may have with measures being taken to fully mitigate these.

International Gateways

If a freeport site was to be located adjacent to an existing port, the international gateways for freight in the South East are well connected to the Strategic Road Network, although some offer better onward connectivity to the rest of the country than others (e.g. the Port of Southampton is better served by the Strategic Road Network and railway network than Shoreham Port). Many of these international gateways already have expansion plans. For example, Heathrow Airport is developing proposals for a third runway to the north-west of its current site; Gatwick Airport has launched its masterplan and a Development Control Order process to seek permission for additional operations; while the Port of Southampton is developing proposals to expand its operations. It will be important to ensure that any future growth at these gateways (to include freeport operations) can be accommodated, by more sustainable modes where possible, and minimising adverse impacts on the communities and environment nearby.

Our transport strategy recognises that the United Kingdom's future relationship with the European Union presents potentially significant uncertainty and challenges for the international gateways in the South East. There is a risk of disruption at the Channel ports in the short term, which could cause widespread disruption on the transport network across Kent and the transport of goods to the rest of the UK. In the longer term, there could be a shift in freight patterns. An initiative we have identified to address this challenge would be to invest in customs checkpoints away from key port locations such as Dover. This could be something to consider as part of the creation of any freeport, as new customs processes could be put in place at the freeport to streamline the movement of freight to the international gateway port.

Movement of Freight

It is important to consider how goods would travel to the freeport. Currently, freight traffic uses some of the most congested roads in the South East area, this is particularly the case for the M25 and the A34 corridors. Our transport strategy identifies the need for modal shift from road to rail, however, the current mode share for rail is relatively low and there are many constraints limiting the scope of rail freight to expand. In some areas (e.g. Dover) the railway gauge limits the transport of containers by rail. There are understandable commercial reasons for a preference for road haulage, especially as the nature of logistics is changing (by moving away from bulk deliveries towards smaller 'just-in-time' package deliveries). However, this

is holding back the potential for freight to contribute to reducing carbon emissions and improving air quality in the South East. Opportunities for modal shift from road to rail need to be taken forward as part of the creation of freeports.

Planning

TfSE wishes to see better integrated economic, spatial and transport planning across the South East.

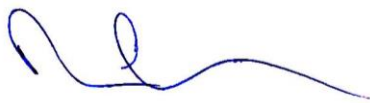
We believe that spatial planning and transport planning should become more closely integrated, ensuring that future housing development occurs in locations close to jobs and opportunities. This approach will ensure that people are able to travel shorter distances to reach economic opportunities, which helps lower the environmental impacts of doing so. Where people still need to travel longer distances, better provision of sustainable transport options should be provided to reduce dependency on the private car. Better integration of different transport modes (for example, through initiatives such as 'park and ride') will help people easily make multimodal journeys and access employment in economic hubs (for example freeports), without needing to rely on the private car.

Conclusion

I hope our response to the freeport consultation has served to highlight a number of aspects of wider surface access that need careful consideration as part of the process of establishing a freeport. We welcome the economic boost and employment opportunities that a freeport could bring, but we want to ensure that any freeport development is planned in a way that reduces the strain on the South East's transport system, its environment and local communities.

This is an officer response. The TfSE Shadow Partnership Board meets on 16 July 2020 and will consider the draft response and a further iteration of this response may therefore follow.

Yours sincerely,

A handwritten signature in blue ink, consisting of a stylized 'R' followed by a series of loops and a long horizontal stroke.

Rupert Clubb
Lead Officer, Transport for the South East