



**Associated British Ports: Port of Southampton Master Plan 2016-2035  
- Climate Conversations response**

Draft plan: [http://www.southamptonvts.co.uk/Port\\_Information/Commercial/Southampton Master Plan/](http://www.southamptonvts.co.uk/Port_Information/Commercial/Southampton_Master_Plan/)

Consultation responses were to be submitted via email by 25th November 2016. A final version of the plan is expected in early 2017.

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25th November 2016

Dear Sir/Madam

Re: Southampton Port Master Plan 2016-2035 - Consultation

Thank you for providing the opportunity to comment on the ABP 20-year Master Plan for the Port of Southampton. This response is written on behalf of the Southampton Climate Conversations network, which works on sustainability and air quality issues in the city.

We have read the Master Plan Consultation Document, Shadow Sustainability Appraisal and Assessment Report, and Shadow Habitats Regulations Assessment as provided on the ABP Southampton website. We wish to make the following submissions and respectfully request further information on a number of statements made in these consultation documents:

Master Plan Consultation Document - air quality

Our primary concern is the inadequate consideration paid to the issue of air quality in the city as a consequence of port operations. This is mentioned briefly in the Master Plan document (paragraphs 5.27-5.33) and we are particularly interested in the following statements:

1. "We are committed to continued working with local authorities to reduce adverse impacts of Port related traffic"
2. "Emissions to air by ships visiting the Port have reduced significantly in recent years."
3. "We are committed to working with shipping lines to assess the viability of the use of alternative fuels when in the Port."

No further information is given to support these statements, so we respectfully request further details on the following:

1. How is ABP Southampton is working with Southampton City Council on minimising emissions from port-related traffic? For example, the Master Plan states (para 2.24) that 60% of containers are transported to and from the port by road. This represents a huge amount of port-related traffic on the main road access corridors for the city. In addition it is stated (para 6.21) that there is an "overall continuing trend of growth in container traffic through the port". **What measures are being taken to significantly**

**reduce the amount of port-related traffic and associated emissions, especially as container traffic through the port is expected to grow over the next 20 years?**

2. Data on ship emissions within the port which demonstrate a significant reduction in recent years, in particular in relation to the very large container ships and cruise ships which regularly dock at Southampton port. **How is ABP monitoring emissions from all vessels entering the port? What are the emissions associated with having the world's largest container and cruise ships regularly in port?** In this respect, we would like to draw your attention to statements made in the Master Plan:
- (I) "In March 2014 the fifth container berth, SCT5, opened. This new 500m long berth, with 16m of available depth of water, is one of the very few facilities within the UK capable of handling the world's largest container ships – which are regular visitors." (Master Plan, para 4.10)
  - (II) "The Port accounts for in the order of 70% of the UK's home port passengers (Arup, 2014) through four cruise terminals." (Master Plan, para 4.15)
  - (III) "By 2015, however, there had already been an increase of 153% in cruise passengers in comparison with the reported 2005 position." (Master Plan, para 6.19)
  - (IV) "By 2015, however, there had been a 27% increase in the number of motor vehicles handled in comparison to the reported 2005 position, surpassing the throughput previously predicted in the first Master Plan for the year 2030." (Master Plan, para 6.20)
  - (V) "There has also been a 37% increase in containers (TEU) handled in 2015 in comparison with the position reported in 2005." (Master Plan, para 6.21)
- With these statements in mind, please provide evidence on how having SCT5 and the four cruise terminals, plus significant growth in cruise passengers, handling of motor vehicles and container traffic (2005-2015), have resulted in a significant reduction, rather than significant increase, in ship emissions in the Port of Southampton?**
3. Progress on the use of alternative fuels by ships when in Southampton port. We would draw your attention to the Alternative Maritime Power program at the Port of Los Angeles.

Shadow Sustainability Appraisal and Assessment Report (SAAR) - air quality

The Shadow Sustainability Appraisal and Assessment Report completely fails to highlight air pollution as an environmental issue related to port operations. Air quality is **not** specifically mentioned as one of the 18 specific SAA objectives, but is simply footnote under objective 12 "Minimise adverse effects of port operations and related activity on climate change" (p39).

Air quality is merely referenced in relation to national and local air quality plans. It is noted (pg 59): "Air quality an important consideration in respect of port operations and future development proposals". However, no information is provided on how air pollution from port operations is currently being monitored or mitigated, or how it will be considered in relation to plans for expansion.

**Why does the SAAR not specifically address the issue of air quality in relation to port operations, especially as it is forms a part of the Master Plan consultation?**

## Economic benefits vs costs to health

We would like to draw your attention to the following statements in the Master Plan:

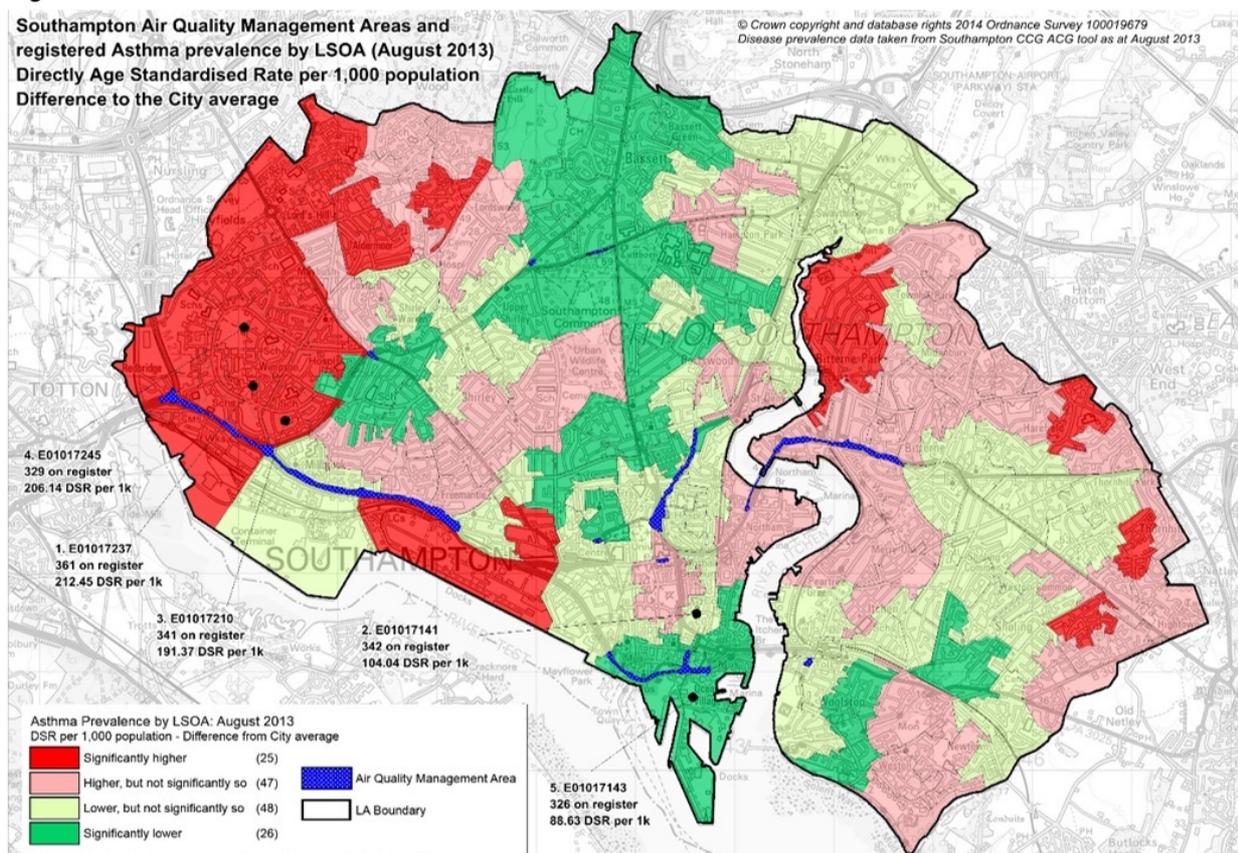
- (1) "Every cruise that embarks or disembarks at the Port has been estimated to generate £2.5 million for the economy (Arup, 2014)." (para 4.17)
- (2) "Up to a further three multi-deck facilities are proposed to be located within the Western Docks representing a further £50 million in the support of UK manufacturers" (para 7.14). We would like to draw your attention to the fact that £50million is also the cost currently associated with health problems related to air pollution from motorised transport in Southampton. This figure does not currently factor in the health impacts from in the effects of nitrogen dioxide or other shipping related emissions, so is expected to be much higher.

**Please could you provide data on how much of the economic benefit mentioned above is accrued by the city of Southampton and its residents? Does ABP believe that the economic benefits outweigh the health costs associated with pollution from port-related activities in the Port of Southampton?**

Please also note that approximately 6% of all mortalities in Southampton have been attributed to air pollution - almost 200 per year. Port-related operations are a significant contributor to air quality issues within the city, in terms of shipping and transport to and from the docks.

We would also like to draw your attention to the Public Health Southampton Annual Report on air pollution: This includes a map of asthma prevalence and air quality management areas (AQMAs) which demonstrates the high rates of asthma sufferers in residents living close to the docks and the major road access routes to the port. We have reproduced this here for your information:

Figure 2



### Master Plan - additional negative environmental impacts

We note with interest the ABP program 'Beyond Zero' (para 2.41, Master Plan): "Our challenge is to achieve Zero Harm across the business." **We would submit however that the current operations of the port are already causing serious environmental and social harm in terms of air pollution, increased greenhouse gas emissions and noise pollution.**

In addition, the plans for future expansion of port operations will mean a significant increase in these negative impacts together with serious environmental degradation of the SSSI and SPA/Ramsar site at Dibden Bay.

This appears to be in contradiction to the following statements in the Master Plan:

- (para 3.2) "... much of Southampton's coastal and water environment is designated for its nature conservation value."
- (para 3.13) "The Marine Policy Statement (MPS) sets out the framework against which decisions affecting the marine environment will be made. It is the Government's vision to have '*clean, healthy, safe, productive and biologically diverse oceans and seas*'."
- (para 5.5) "Southampton Water and the Solent have long been recognised for their high biological and nature conservation importance. There are a number of sites of international nature conservation interest in the vicinity of the Port. These are shown on Figure 5.1 and include Ramsar sites, Special Protection Areas (SPAs), Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI). SPAs and SACs are collectively known as 'European Sites' and are the basis for the 'Natura 2000' network."

**In our view ABP has not provided strong enough evidence to support an Imperative Reasons of Overriding Public Interest (IROPI) case in relation to the protected areas at Dibden Bay. The arguments in favour are solely based on economic interests and do not take environmental or social concerns into account.**

This is despite the statement in the Master Plan (para 3.32) that: "The Port's future is a key element of the social, economic and environmental make-up of the region and South Hampshire sub-region." The bulk of the Master Plan refers, in some detail, to the economic elements, but pays scant regard to the social and environmental aspects of current and future port operations.

We hope you give our comments serious consideration and we look forward to reading your report on the responses received.

Yours sincerely

Mandi Bissett

On behalf of Southampton Climate Conversations

## Further References

Government, scientific and media attention has been focused on the damaging environmental and health impacts of shipping. For example:

- ◆ “The shipping industry currently imposes costs on the health of the population, the natural environment and the built environment, for which the industry does not take full responsibility. [...] In the case of the emissions from shipping, which result in external costs to the wider community, there has been no significant attempt by the polluter, in this case the shipping industry in aggregate, to minimise its impact or to compensate and offset the associated external cost.” Defra, Prevention of Air Pollution from Shipping, Annex B - Impact Assessment
- ◆ “The human and environmental costs of shipping are vast. Low-grade marine fuel oil contains 3,500 times more sulfur than road diesel. Large ships pollute the air in hub ports, accounting for one-third to half of airborne pollutants in Hong Kong, for example. Particulates emitted from ships cause 60,000 cardiopulmonary and lung-cancer deaths each year worldwide. Expanding harbours to take vast ships destroys coastal ecosystems.” (Nature, 17 Feb 2016)
- ◆ “According to leading independent German pollution analyst Axel Friedrich, a single large cruise ship will emit over five tonnes of NOx emissions, and 450kg of ultra fine particles a day.” (The Guardian, 21 May 2016)
- ◆ The BBC programme Costing the Earth has also produced an episode titled “Cruising: A dirty secret” (the section on Southampton begins at 8mins 43secs).
- ◆ The University of Southampton held a conference on atmospheric pollution in July 2016 which representatives of ABP were invited to, but did not attend. A summary of the issues discussed can be found here: <https://climateconversations.org.uk/2016/07/24/grey-matter-expert-evidence-on-atmospheric-pollution/>