Delivering on the promise of **Freeports**

March 2023

Contents

Executive summary

*The Treasury's announcement in the 2021 Spring budget of eight new Freeports promised opportunities for historically deprived UK communities.**

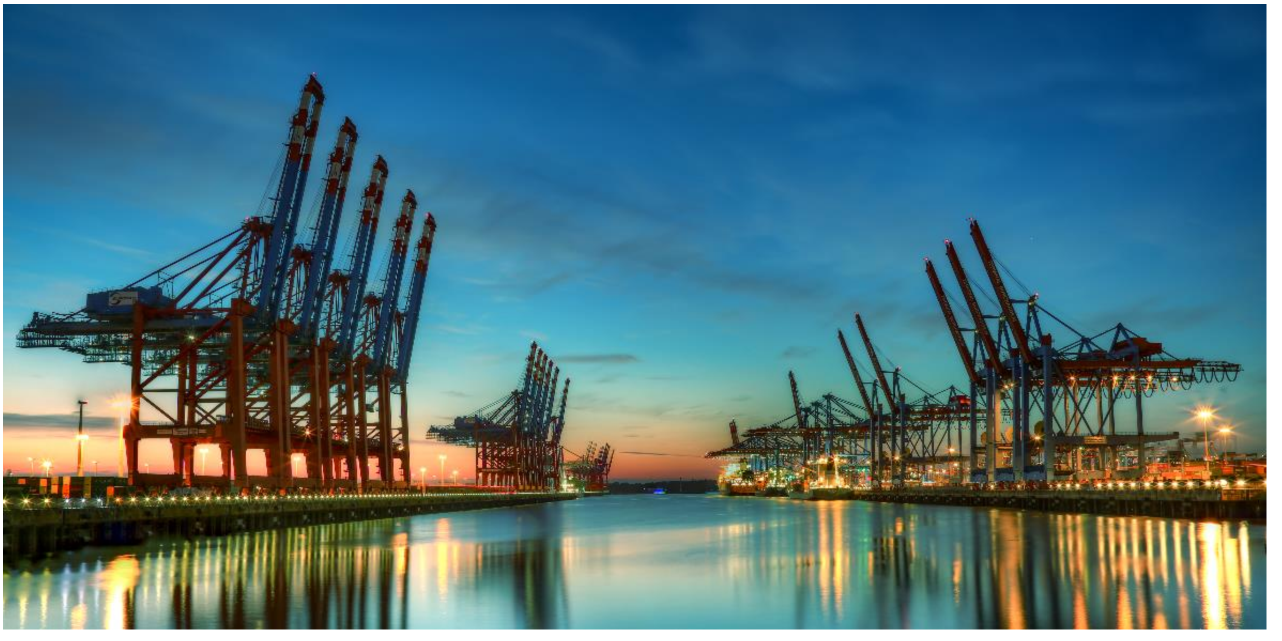
The additional infrastructure, investment, and jobs expected from the introduction of Freeports will be a key element in the delivery of one of the government's central policies: 'levelling up' the UK.

However, it is by no means certain that all Freeports will be a success, nor will it be easy to measure success. Maximising the benefit from the Freeports programme will require a clear strategy and effective management. Each Freeport will need to demonstrate to investors and employers the assets and infrastructure they can offer, as well as their plans for improvements. In addition, the plans for each Freeport project should be embedded within a strategy to bring benefits and regeneration to the wider region.

This paper sets out the importance of structuring the Freeports initiative as a large-scale coordinated programme, with each of the interrelated projects centrally co-ordinated in order to ensure delivery of mutually reinforcing, measurable and regenerative outcomes for some of the country's most deprived regions. The paper is up-to-date as of March 2023, recognising that government policy on Freeports may evolve.

**In the 2023 Spring Budget, Chancellor Jeremy Hunt announced that the Government will launch 12 Investment Zones across the UK with the aim of catalysing high-potential knowledge-intensive growth clusters. Investment Zones will benefit from Government support including tax incentives and flexible grant funding. With further development ongoing ahead of the intended agreement of Investment Zone proposals by April 2024, this report focuses on the details of the Government's existing initiative, the UK Freeports programme.*

What are Freeports?



The UK government's plan is to establish eight Freeports in England with further to be established around the UK. Although there are significant differences in characteristics between Freeports, or 'free zones', as implemented around the world, what they have in common is that they are all designated areas which offer tax, customs and/or regulatory incentives, to facilitate trade and attract businesses and investment.[1]

The differences between Freeports around the world relate mainly to size, purpose, characteristics and structure. For example, they can be managed through public-private partnerships, wholly public or private entities, or partnerships between neighbouring countries. Freeports legislation may cover entire cities or regions, as in China, or may focus specifically on individual areas of real estate such as a business park, or even (as in the US) on a single business which has applied for free zone status.[2]

Freeports are government interventions to achieve economic benefits via policies on tax and the regulatory environment. However, they also require co-ordination of measures to provide the necessary infrastructure to support each intervention. Each Freeport should be considered and managed as a project in its own right, as well as a constituent element of the wider Freeports programme.

Addressing regional inequality

Freeports are seen by many as a crucial plank in the government's 'levelling up' efforts to reduce regional inequality. There is a marked disparity in incomes and life chances between the poorest and richest areas in the UK: for example in 2019 there was a 10.5-year gap between the areas with the highest (Westminster) and the lowest (Blackpool) life expectancies.[3]

However, the imperative to re-balance the geographic distribution of the UK's economy is an economic one as much as a social one. It has been estimated that the annual economic value to the country of building capacity in the North of England to produce the same output per head as the rest of the UK would be over £60bn, with Freeports identified as a key element for achieving this re-balancing.[4] The UK government's Freeports initiative is intended to achieve economic re-balancing as well as social benefits, across the eight planned Freeports in England with further Freeports to be designated for the devolved nations. Prime Minister Rishi Sunak has long been an advocate for Freeports both in his time as Chancellor and also as a backbencher: his 2016 report for the Centre for Policy Studies, *The Free Ports Opportunity* suggested that a UK Freeport programme could create up to 86,000 new jobs in some of the country's most deprived areas.[5] The UK Freeports Annual Report 2022, published in December 2022, stated that estimates from the eight English Freeports indicated that they will contribute to creating 131,000 direct and 83,000 indirect jobs.[6]

The Labour Party is also in favour of driving regional growth through industrial clusters, although the recent report *A New Britain: Renewing our Democracy and Rebuilding our Economy* states a preference for stimulating the economy through greater devolution of industrial policy and investment to regional governments, rather than through the use of tax incentives.[7] Regardless of the differences in approach, however, there is consensus between the country's two leading political parties about the need for clustering to reduce regional inequality. Their policies can only be delivered through programmes of work.

Programmes of work are "temporary structures designed to lead multiple inter-related projects and other work in order to progressively achieve outcomes of benefit for one or more organisations," whereby the outputs or products of multiple projects contribute to an overall or systemic outcome.[8] The Freeports initiative should naturally be understood as a programme due to the inter-relations and co-dependencies between each individual Freeport project in delivering overall policy outcomes.

Global examples and job creation

Advocates of Freeports in the UK point global examples of success, including Foreign Trade Zones (FTZs) in the US. When set up initially, the eligibility to become an FTZ was defined by socio-economic characteristics, such as "comparative unemployment rates, population levels and trends, poverty status, median incomes, and percentage of welfare recipients."[9] However, this has changed over time, and individual firms can now obtain FTZ status specific to where they work. The United States is now home to over 250 FTZs, employing 420,000 people and handling $750bn of merchandise, with FTZ exports more than tripling since 2009 and FTZ employment outpacing overall US job growth in recent years.[10]

However, there may be complications. Early studies suggest that just 15-20 per cent of roles in areas chosen for their socio-economic characteristics went to zone residents, who were paid, on average, only about half as much as other workers. Multiple studies have demonstrated that it is not possible to predict the extent to which investment in Freeports will be net new investment rather than relocation of existing businesses.[11]

Previous experience with British "economic zones" in the 1980s, targeted at stimulating investment in previously underdeveloped areas, is that between 50 and 80 per cent of zone businesses were relocations.[12] When the aim to re-balance economic activity is a primary objective, this need not necessarily be a problem, and the transfer of jobs from one region to another can be desirable in itself. This can be seen in the UK government's commitment to move 22,000 civil service jobs out of London by 2030.[13]

An example of where a Free Trade Zone has been effectively integrated into a regional strategy is in Galang Batang in Indonesia, a large a free trade zone covering 2,334 hectares of land. Galang Batang is intended specifically to build Indonesia's global role in aluminium mining and refining. The main constructions in the zone are a seaport, a 6x25 MW coal-fired power plant, a water reservoir, an alumina refinery plant and a smelting plant.[14]

Whilst it may succeed with its global ambition, Galang Batang faces similar challenges to other Freeport programmes in meeting its aims regarding local employment. The programme developer has said that it is aiming to create 23,000 direct and indirect jobs specifically for local residents, yet recruitment is behind plan as the company reports difficulties in finding people with the right technical skills.

The economic stimulus created by a Freeport or free zone is measured not just in terms of direct jobs for local people, but also in creating indirect jobs in secondary industries, as well as in investment in local infrastructure and the contribution to a broader economic and social strategy. Nonetheless, the challenges in creating employment opportunities for local people demonstrate that some of the biggest difficulties in delivering the benefits of Freeports exist not necessarily in building the requisite infrastructure, but in ensuring that these outputs deliver on the promises of the underlying public policy.

The new English Freeports

Whereas individual companies in the US can apply for American FTZ status, the criteria for English Freeports were specifically designed to address the challenge of regional inequality, with three specific policy objectives:

1. To establish Freeports as national hubs for global trade and investment
2. To promote regeneration and job creation
3. To create a "hotbed" of innovation[15]

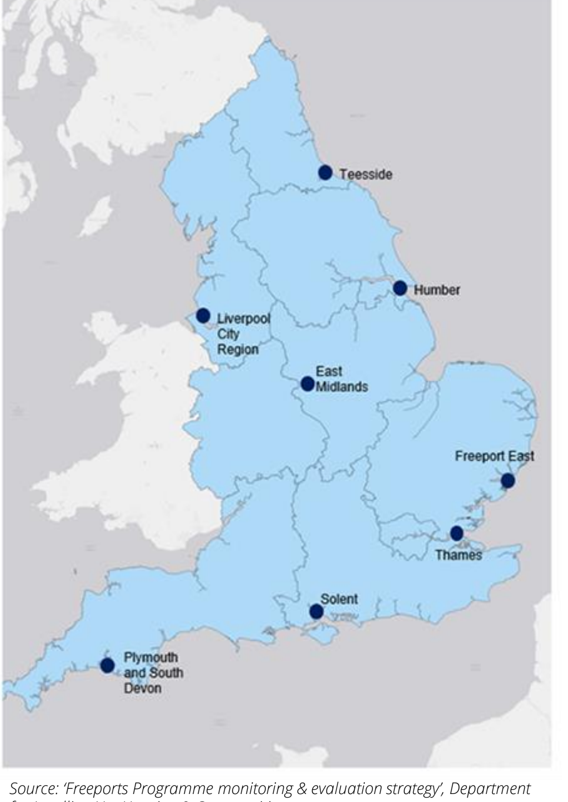
Further considerations applied, namely to ensure broad national coverage and in particular to mitigate against the risk of adverse impact from the relocation of jobs, and to align the Freeports policy with the broader industrial strategy (and in particular the aim to achieve net zero emissions of greenhouse gases).[16] The eight English Freeports, scoring the highest against these criteria, were:

- East Midlands Airport
- Felixstowe and Harwich
- Humber region
- Liverpool City Region
- Plymouth
- Solent
- Thames
- Teesside

To understand what the government is looking for most, it is instructive to examine the Humber, the highest scoring successful entry. The Humber region is already home to the UK's busiest port complex , with the four major ports of Hull, Goole, Immingham and Grimsby handling in total around 17 per cent of UK foreign trade, including supply of 10 per cent of the nation's energy, 25 per cent of the UK's fuel for vehicles, and almost a third of the national timber supply.

The Humber is a region with high levels of deprivation and a large available workforce, whilst also producing the most greenhouse gas emissions in the UK. However, there is already a hub in the region for green energy, with an offshore wind catapult in the Port of Grimsby and the Siemens Gamesa plant in Green Port Hull.[17] Ensuring that the available workforce has the required skills will likely require targeted intervention, but this is an opportunity to provide local people with valuable skills which would boost longer-term economic regeneration in the region.

The English Freeports



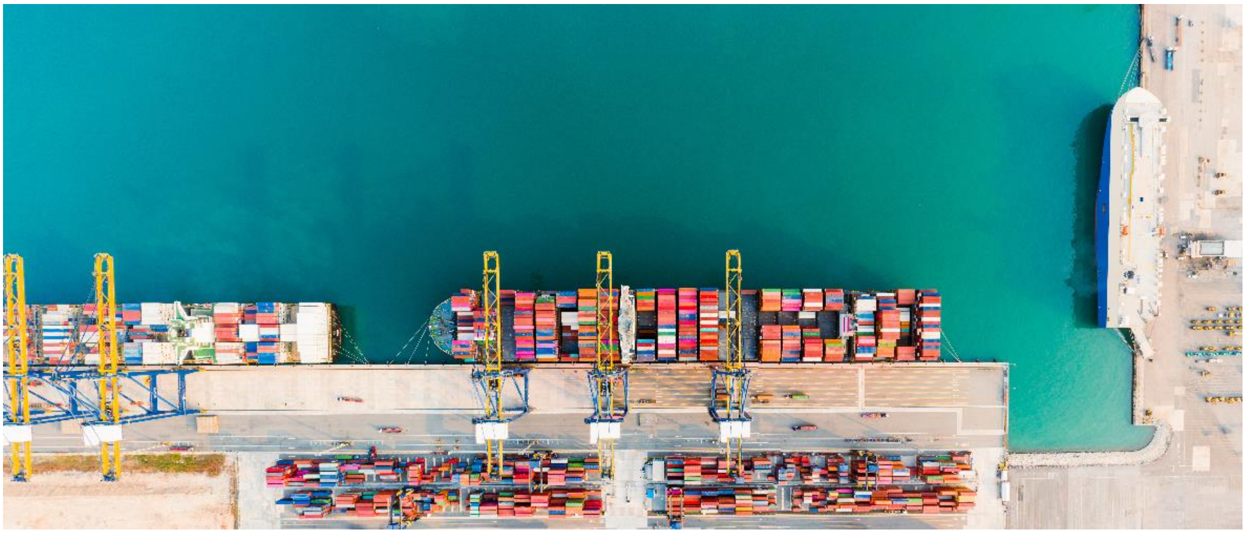
Source: 'Freeports Programme monitoring & evaluation strategy', Department for Levelling Up, Housing & Communities

In 2013, the UK ports sector employed an estimated 118,200 people and contributed £7.7bn to UK GDP, but it is not only the ports sector which stands to benefit from the Freeports programme.[18]

It is notable that not all the Freeports are actually 'ports' in the maritime sense. This reflects the fact that ports are becoming a more tightly integrated part of supply chains, as opposed to discrete centres of distribution. Successful ports need to develop increasingly sophisticated logistics, finance, and technology services.[19] This presents an opportunity for the UK's outstanding logistics and IT industries to be at the forefront of delivering the government's economic transformation agenda,

Following an announcement in February 2022 that "Green Freeports" would be established in Scotland, it was announced on 13 January 2023 that Inverness and Cromarty Firth Green Freeport and Forth Green Freeport had been selected by the Scottish and UK governments to become the first Green Freeports.

Applicants had been required to demonstrate how they would contribute towards net zero emissions by 2045 and create new green jobs, as well as supporting high quality employment opportunities. The successful bids aim to create up to 75,000 new jobs with activities such as renewable energy including offshore wind turbine manufacturing, contributing towards net zero ambitions.[20]



Considering Supply Chains

Implementing the Freeports programme will require close attention to supply networks and logistics. Careful planning is needed to ensure that each port is attractive for handling both imports and export. The creation of Freeports may not lead to a big increase in demand for port facilities. There is a risk that Freeports could take jobs away from other ports, or that demand for shipping will continue largely through existing ports. These risks have been negated somewhat by choosing some of the UK's largest ports by tonnage for Freeport status, including London, Liverpool, Southampton, Teesside and Felixstowe.[21]

However, where the Freeports are expected to increase import and export traffic, careful planning will be required to consider the speed of scaling up capacity and how to attract the resources required, from crane operation to haulage. Any planned increase in demand for logistics will also require investment in transport infrastructure, not just by road and rail, but also by air and sea. The Ever Given Suez incident that blocked the Suez Canal for several days in 2021 should be a reminder of the increasing size of super-container ships and the capacity of ports to service them.

An example of how the capacity of ports matters is illustrated by comparing Rotterdam, the largest seaport in Europe, which processed 436.8 million tonnes of cargo in 2020, with London, the UK's largest port, which processed 47.4 million tonnes.[22] The scale of operations at Rotterdam enables logistics companies to route major international shipping first to Rotterdam before transferring it via rail or road to the UK.

Businesses may weigh the benefits of scale against the impact of Brexit on logistics. Businesses that previously imported goods into the EU through a single point of import for onward transit to the UK may now face increased costs and administrative 'red tape' for onward transit following the UK's exit from the EU. ONS data shows that the value of UK goods imports from non-EU countries has grown faster than from EU countries since the end of the Brexit transition period: this may reflect a shift in some supply chains away from a single point of import into the EU towards a non-EU to UK direct route.

Clearly, considerations about supply networks may well affect investment and relocation decisions. The additional tax incentives for Freeports (which go beyond just customs reliefs), while necessary for stimulating growth, will have a range of effects depending on the profile and investment horizon of businesses.

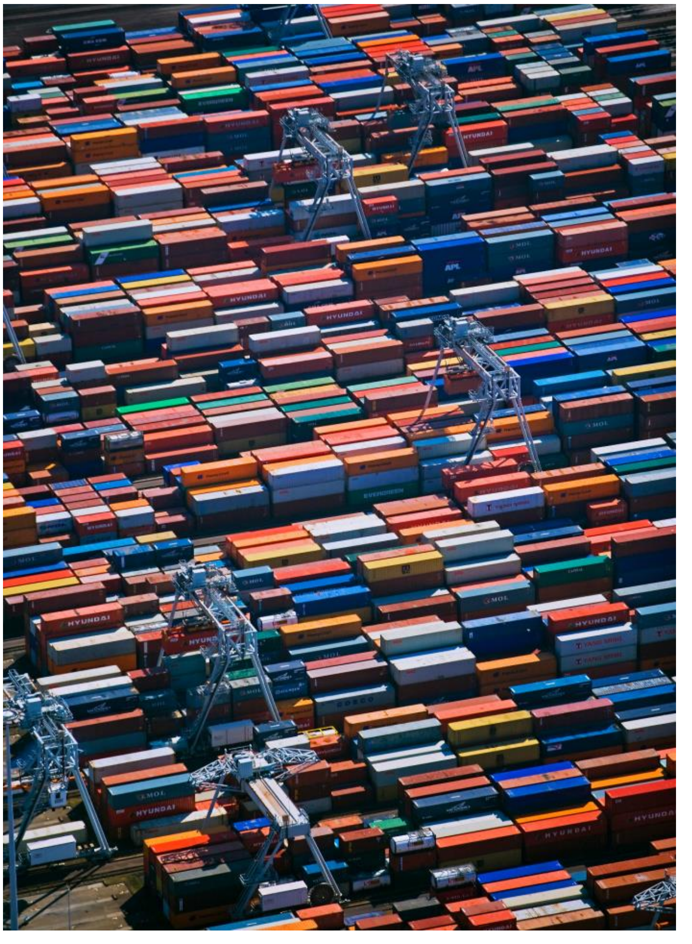
For example, advantages which businesses can obtain through investing in Freeports include reliefs on Stamp Duty Land Tax and Employer's National Insurance Contributions. However, the tax relief offered on capital allowances, making capital investment in Freeport sites more attractive, will only provide an immediate cash tax benefit for businesses which are profit-making at the time.

Furthermore, the capital allowances relief which is specific to Freeports is also only greater for certain types of expenditure than other generally-available enhanced capital allowances reliefs, including the 'super-deduction' relief available until 31 March 2023[23] and the 'full-expensing' relief announced at the 2023 Spring Budget.[24] The latter relief is available from 1 April 2023 until 31 March 2026, just 6 months before the expiration of the Freeports capital allowances regime.

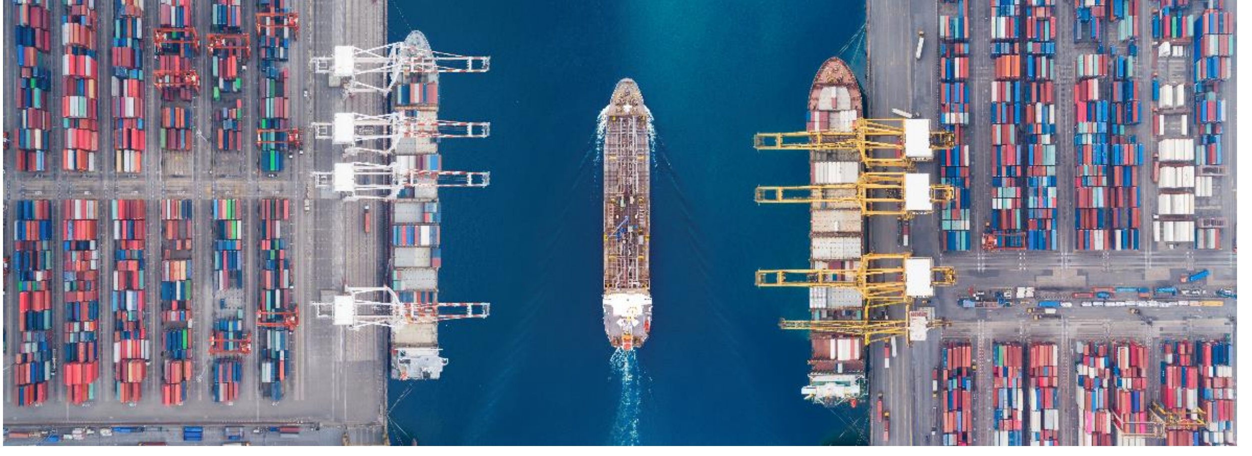
These reliefs accompany the permanent setting of the Annual Investment Allowance - another 100% first-year relief for certain capital expenditure - at £1 million per group per annum.

This combination of generally-available reliefs reduces the comparative attractiveness of Freeports in terms of the acceleration of capital allowances.

Evidently, individual Freeports will have to create a holistic proposition to attract relocating businesses and stimulate new investment, whilst centralised policy and programme management is needed in order to meet national policy goals.



Delivering the Freeports programme



Implementation of the Freeports policy is a significant programme comprising a number of major projects (for the individual Freeports). This need for policy coordination should be reflected in the approach of those charged with implementation. The UK's Freeports initiative is a complex policy intervention scheme, with multiple desired outcomes but fraught with numerous unknowns and risks.

In monitoring and evaluating the effectiveness and benefits of Freeports, there are lessons that can be learned from other major government projects and programmes. The Infrastructure and Projects Authority's (IPA)'s recent evidence to the Public Accounts Committee (PAC) recommended more front-end development of programmes, with greater accuracy in cost estimates and clearer definitions of outcomes.[25] Too often, not enough time is taken over planning, and consequently programmes are implemented with standards that are not high enough, unrealistic schedules, and dependencies that are not fully understood. Moreover, it is essential that team leaders with the right skills and experience should be identified and recruited to lead the programmes. As Lord Browne noted in his review of major projects in the public sector in 2013, in the private sector "the project will not be allowed to proceed until the capability to deliver it has been identified."[26] Seven years later, the PAC noted that attracting the right skills and leadership to major projects and programmes remains a pressing challenge.[27]

Finally, it is also common in complex programme environments for teams to continue reporting against outdated plans and milestones which no longer make sense, and trying to mitigate the impact of events which have already happened. Timelines are revised when delays occur, but the causes of slippage are not addressed, so milestones begin to slip again until the next revision. It is for this reason that Deloitte has developed our Programme Aerodynamics® methodology to ensure that programme delivery focuses on outcomes, rather than plans.

Central to the question of delivering the Freeports programme will be realising the planned benefits. The Freeports programme would benefit from a series of bespoke metrics that look at value for money to assist in assessing initial business cases as well as for ongoing performance on both a project-by-project and a pan-programme basis. This would enable the benefits of the policy to be properly measured.

The Freeport tax and customs incentives apply only within specific Freeport 'tax sites' and 'customs sites'. Tax sites for all eight Freeports in England have been formally designated, although customs sites have only been formally designated for seven of them. [28]

It is not always clear if an investment is a direct result of Freeport status, even where it is within the tax site and able to take advantage of capital allowances (and other tax) reliefs. For example, Scottish Power has recently announced plans to explore the creation of a Green Hydrogen hub at the Port of Felixstowe, describing the project as necessary for the energy transition of what is already the UK's biggest port.[29] The accompanying press release makes no reference to Freeports.

The delivery of the Freeports programme will continue to evolve, with two Freeport sites in Wales announced in March 2023, and with work ongoing to explore Freeports in Northern Ireland.

The potential changes to the regulatory landscape around Freeports, in addition to the staggered addition of further sites, provides an opportunity to supercharge the overall Freeports programme by building in "modular replicability". This means breaking down projects and programmes down into blocks that can be replicated, which will enable acceleration of the delivery of value and the capture of lessons learned. The experience of delivering each Freeport can help inform the approach to the next.[30] Whilst it is important to recognise that each project will be different, they will also experience similar challenges and opportunities.

Incentives	
Trade and Investment support • The Department for International Trade (DIT) will work with successful bidders to establish a trade and investment support approach and workable business support programme.	Customs • Customs duty deferral, customs duty exemptions, and customs duty inversion • Simplified import procedures
Planning • Streamlining of planning processes through proposed changes to permitted development rights, use of Local Development Orders (LDOs), changes to Environmental Impact Assessment and a potential review of the National Policy Statement for Ports. • Opportunities for links with strategic regeneration projects and wider economic development priorities for Local and Combined Authorities, as well as links to other infrastructure such as rail and air.	
Capital investment incentives • Enhanced Capital Allowances for new qualifying plant and machinery assets • Enhanced Structures and Buildings Allowance for construction or renovation of non-residential buildings • Relief from Stamp Duty Land Tax for purchases of qualifying property and land	
Indirect taxes, payroll, and other reliefs • Suspension of import VAT • Reduced Employer National Insurance Contributions (NICs) • 100per cent relief from business rates on certain business premises	

It has been made clear that the British Freeports will be individually tailored with a specific economic focus, with the then-Ministry of Housing, Communities & Local Government (MHCLG) stating that local authorities will have discretion to ensure there is no displacement of business activity from areas immediate surrounding the designated zones.[31]

However, whilst the creative use of tax regulation is necessary for promoting regional growth through Freeports, its impact will vary from business to business depending on their specific investment plans and profit profile. Government will need to work with businesses to help them understand the objectives and focus of each Freeport and work out what is required to make each a success, whilst also ensuring that the value to UK plc of the total programme initiative is more than the sum of its parts. It is only by recognising and structuring initiatives as part of a larger-scale major programme that this can be ensured.

Addendum

The Department for Levelling Up, Housing and Communities have published a paper setting out a Monitoring and Evaluation Strategy for the delivery of the Freeports Programme, produced in line with the UK Government's Magenta Book.

The Monitoring & Evaluation (M&E) Strategy will initially run for five years, aiming to provide accountability to Parliament as well as transparency to the public for the implementation, effectiveness and overall impact of the Freeports programme, providing robust data-driven findings and enabling simultaneous learning and capacity-building. It will initially apply to the Freeports programme in England, with further work to be undertaken to understand how to expand it to the devolved nations. It sets out:

- How performance against Levelling Up outcomes will be measured
- An initial logic model which will underpin a Theory of Change for the programme
- The framework for an Impactful Learning Programme to identify and share learnings and insights

The four core activities carried out by the UK Freeports Programme Monitoring & Evaluation Strategy will include:

1. Ongoing monitoring
2. Process evaluation
3. Impact evaluation
4. Value for money evaluation

A number of clear high-level research questions defining the scope of the evaluation have been developed for each of the four core Monitoring & Evaluation activities.

Levelling Up Outcomes

As one of Government's flagship programmes, the UK Freeports Programme is underpinned by and directly translates to the four missions of the Levelling Up White Paper:

1. Productivity
2. Quality of life
3. Pride in place
4. Leadership

The White Paper's Technical Annex presents a number of metrics to measure spatial disparities across six factors, which the UK Freeports M&E Strategy will use to track the programme's performance in Levelling Up outcomes over time.

Theory of Change

A Theory of Change (ToC) for the programme's M&E Strategy will be developed to understand the intervention and how it is anticipated to achieve the desired outcomes. This will be further developed and refined as new evidence becomes available, including finalising the underpinning logic model, setting out key assumption and risks, and developing a suite of hypotheses to test.

It has been recommended the ToC be reviewed at the end of each year in order to assess the validity of causal contributions, identify evidence gaps and enable revision of methodology accordingly. The ToC will therefore evolve based on findings each year.

Impactful Learning Programme

The Impactful Learning Programme, designed to evaluate and share lessons learned, is defined by three principles:

1. Identify and engage with stakeholders from the outset to understand how they will use the evaluation learning
2. Guide and adapt the M&E process based on stakeholders' intended use of the evaluation learning
3. Analyse, interpret, and share findings in a way which will be best used by stakeholders with a view to this having an effect on current and future learning programmes

Four high-level stakeholder groups have been identified to engage with:

1. Freeports, the impact area and delivery partners (such as Freeports themselves, local communities, and local data collectors)
2. Governmental stakeholders
3. Parliamentary stakeholders
4. Wider societal interests (such as members of the public outside of Freeport impact areas, public policy and research bodies)

The Learning Programme will work with a wide range of both public and private stakeholders and will provide the opportunity to inform future policies and programmes as well as an opportunity to ensure accountability.

Next Steps

The focus of the UK Freeports Programme M&E Strategy is to define the Monitoring & Evaluation Framework in detail in close collaboration with Freeports and stakeholders. Year one up to the end of 2022 has concentrated on developing the ToC and M&E framework, gathering relevant baseline data and beginning to assess how Freeports are being delivered. To ensure consistency in data gathering a range of guidance and templates have been developed to support data collection activities. In addition, confirmation of the learning programme taking place will enable significant learning activities to begin.

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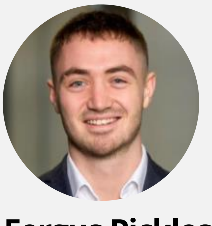

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