

Response ID ANON-KEGA-A9N6-P

Submitted to **A Consultation on Scotland's National Transport Strategy**

Submitted on **2019-10-22 15:55:44**

Section A: The Vision and Outcomes Framework

1 Is the Vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years?

Not Answered

Please explain your answer.:

Whilst we don't disagree with the vision, it lacks focus on efficiency and movement of goods.

With the food and drink sector in Scotland looking to double the turnover of the industry to £30bn by 2030, this relies on an efficient and cost-effective transport network both for domestic and overseas markets.

2a Are the Priorities and Outcomes that the Strategy is trying to achieve the right Priorities and Outcomes for transport policy over the next 20 years?

Not Answered

Please explain your answer.:

FDf suggest that the priorities and outcomes could be streamlined to focus on where the biggest impacts will be in terms of improving the efficiency of movement of people and goods.

We question whether the strategy is horizon scanning far enough and looking to the next innovations in movement of people and goods.

2b Are some of these Priorities and Outcomes more important than others or are they equally important?

Please explain your answer.:

As a trade body, we ask the Scottish Government to focus on how the National Transport Strategy can help the economy prosper. This would include improving public transport options for staff to commute to work and moving goods around and in and out of Scotland.

We agree that the announcement of the climate emergency means that collective action is needed on climate change. The consultation states that only 5% of total transport emissions are associated with freight as opposed to 40% by cars. With this in mind, we suggest prioritising improving and repairing the road network in Scotland so freight can drive more efficiently. We agree that ULEVs are good for reducing emissions but this will not solve congestion issues and will still require a well-maintained road network.

3 Are the Challenges the Strategy highlights in Chapter 3 the key Challenges for transport, or are there others the Strategy should focus on?

Please explain your answer.:

As with response to Q2 – We would ask the Scottish Government to focus to the challenge of moving business and workers around as efficiently and cost effectively as possible.

We urge the Scottish Government to consider the financial impact of policy measures on hard-working families.

We welcome the pragmatic approach to aviation in light of the climate emergency however much of food produced in Scotland for export is driven to Dover and exported by sea so consideration of our port infrastructure would be welcome.

Section B: The Policies to Deliver the NTS

4a Are these the right policies to deliver Priorities and Outcomes of the National Transport Strategy?

Please explain your answer.:

14 policies to deliver a transport strategy for Scotland seems excessive and risks a lack of focus on addressing the key priorities relating to efficient and cost-effective movement of people and goods.

Whilst our members don't disagree with any of the policies above, we note the lack of detail of how these policies will be delivered. We ask SG to continue to engage with industry to best understand how to future-proof a logistics and freight system in Scotland for the next 20 years.

Efficient movement of goods is critical for the food and drink sector due to the perishable nature of our products.

We suggest the Scottish Government should develop a transport investment hierarchy with impacts, milestones and targets.

Members have put forward some ideas for the Scottish Government to consider they could deliver increased economic growth such as:

A land bridge between Northern Ireland and Scotland

A direct ferry link from Scotland to Europe

4b Are some of these policies more important than others or are they equally important?

Please provide details.:

To help the food and drink industry in Scotland prosper, our industry views the following three policies as priority:

- Provide a transport system which enables businesses to be competitive domestically, within the UK and internationally

- Provide a high-quality transport system that integrates Scotland and recognises our different geographic needs
- Improve and enable the efficient movement of people and goods on our transport system

We emphasise our response to Q4a – there is a lack of detail on how the Scottish Government will achieve these aims. In our view, to deliver these policies, the Scottish Government should aim to invest in , for example,

Repairing and improving Scotland's road network – not just trunk roads. This will allow HGVs to drive more efficiently and speed up the movement of food and drink products.

Section C: Transport governance – democracy, decision-making and delivery

5a Are there specific decisions about transport in Scotland that are best taken at the national level (e.g. by Transport Scotland or the Scottish Government), at a regional (e.g. by Regional Transport Partnerships), or at a local level (e.g. by Local Authorities)?

Please explain your answer, by providing examples of where you believe transport related decisions should be taken.:

FDF members suggest that the Scottish Government could support regional decisions with a policy framework and or guiding principles for Local Authorities.

5b Should local communities be involved in making decisions about transport in Scotland? If so, how should they be involved, and on which specific issues should they be involved in making decisions on?

Please explain your answer, by providing examples of which transport decisions local communities should be involved in, also suggesting how they should be involved.:

In our view, decisions about local requirements for transport should involve businesses and the wider community as businesses have different needs to and communities should be involved.

Section D: The Strategy as a whole

6 Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

Not Answered

Please explain your answer.:

Currently the strategy is too high level for us to be able to answer this. We would welcome the opportunity to input in to shaping any delivery plans for the policies outlined above.

Section E: Looking Ahead

7a What aspects of the transport system work well at the moment?

Please provide details.:

7b What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

Please provide details.:

8a What aspects of the transport system do not work well at the moment?

Please provide details.:

The road network is in an extremely poor state of repair and requires urgent attention to bring it in to a fit state.

The current system is very poorly integrated.

The food and drink supply chain is built on the "just in time" delivery model where retailers do not hold back stock of products. This is to minimise wastage. The current transport system lacks resilience, over the last few winters, when there has been severe weather, the entire transport system has ground to a halt in Scotland resulting in empty shelves in grocery retailers and panic buying by consumers.

8b What practical actions would you like to see the National Transport Strategy take to improve these?

Please provide details.:

We agree that the Scottish Government should be held accountable for the transport infrastructure in Scotland and that the strategy should be evidence-based.

We add that the evidence-base should including horizon scanning to understand what the future demands on the transport infrastructure should be.

The Scottish Government must be careful when making decisions about "managing demand" for transport. The strategy cites making investment decisions based on The Sustainable Transport Hierarchy – there is no provision made for movement of goods and logistics in this hierarchy – the Scottish Government must consider movement of goods as well as people in future investment in the transport infrastructure.

In addition, the strategy makes mention of the Scottish Government's support for the Workplace parking levy under the heading of the "sustainable investment hierarchy".

Our members are deeply disappointed to see this piece of punitive legislation going ahead when in many cases there are no alternative ways for our workforce to get to and from food and drink manufacturing sites. A levy of £400 per year passed down to an employee will increase the average weekly transport cost for an individual by more than 11%. (Scottish Government cites ONS data for average spend on transport as £68.20)

9 Chapter 6 of the Strategy sets out immediate actions the Scottish Government will take in three key areas: Increasing Accountability; Strengthening Evidence; and Managing Demand. Is there anything you would like to say about these actions?

Please provide details.:

10 Is there anything else you would like to say about the National Transport Strategy?

Please provide details.:

We stress that the response to question 1 is not a simple 'yes' or 'no' answer. We do not disagree but we do not think this is tailored or specific enough to the movement of people and goods.

This submission is made by the Food and Drink Federation (FDF) Scotland. FDF Scotland represents the food and drink manufacturing industry in Scotland. We are Scotland's largest manufacturing sector, accounting for 30% of total manufacturing turnover and our gross value added to the economy is £3.8bn, representing 29.7% of Scottish manufacturing value added. We have 1,015 food and drink manufacturing businesses, employing 45,000 people, which represents 25% of the Scottish manufacturing workforce.

The following Associations actively work with the Food and Drink Federation:

ABIM Association of Bakery Ingredient Manufacturers
ACFM Association of Cereal Food Manufacturers
BCA British Coffee Association
BOBMA British Oats and Barley Millers Association
BSIA British Starch Industry Association
BSNA British Specialist Nutrition Association
CIMA Cereal Ingredient Manufacturers' Association
EMMA European Malt Product Manufacturers' Association
FCPPA Frozen and Chilled Potato Processors Association
FOB Federation of Bakers
GFIA Gluten Free Industry Association
PPA Potato Processors Association
SA Salt Association
SNACMA Snack, Nut and Crisp Manufacturers' Association
SSA Seasoning and Spice Association
UKAMBY UK Association of Manufacturers of Bakers' Yeast
UKTIA United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance

Section F: Strategic Environmental Assessment (SEA)

11 What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?

Please give details of additional relevant sources.:

12 What are your views on the predicted environmental effects as set out in the Environmental Report?

What are your views on the predicted environmental effects as set out in the Environmental Report?:

13 What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?:

14 Is there anything else you would like to say about the Environmental Report?

Is there anything else you would like to say about the Environmental Report?:

About you

1 What is your name?

Name:

Cat Hay

2 What is your email address?

Email:

cat.hay@fdfscotland.org.uk

3 Are you responding as an individual or an organisation?

Organisation

4a What is your organisation?

Organisation:

FDF

4b If responding on behalf of an organisation, please indicate which category best describes your organisation.

Other

If other, please specify.:

Trade representative organisation

5 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

6 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Many of the questions asked for a yes or no answer - a third option of don't know/other would be useful

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: