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What is your name?

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☐

Individual

☒

Organisation

What is your organisation?

If responding on behalf of an organisation, please enter the organisation's name here.

Timber Transport Forum

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

☐

Local Authority

☐

Third sector or Community Groups

☐

Private Sector

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Regional Transport Partnership

☐

Transport Operator

☐

Academia/education

☒

Other

The Timber Transport Forum is a voluntary partnership of local authority roads authorities, the forest industry and national agencies and organisations. The Forum is concerned with supporting the forest and timber sector, a £1bn sector that involves 20% of our land area, provides 20,000 jobs mostly in rural Scotland and is vital in addressing the climate emergency by storing and sequestering atmospheric carbon and providing low-carbon alternatives to more environmentally damaging and greenhouse gas generating materials. The forest and timber industries move 8.5 million tonnes of logs from Scottish forests to processors across rural Scotland every year over 10,000km of minor rural roads.

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- ☒ Yes
- ☐ No

Overview

The consultation is on the new draft National Transport Strategy (NTS) for Scotland, which aims to set out a compelling vision for the future of transport for the next twenty years.

Why we are consulting

We are consulting on the new draft National Transport Strategy to help determine whether the Strategy's Vision, Priorities and Outcomes are the right ones for our transport network for the next twenty years. We want to know if the policies contained in the Strategy are the right ones to help deliver it, and how the Strategy can continue to support what works well and address what does not work so well in our transport system. Your views will be key in helping to shape the kind of transport we want for the next two decades.

NTS Consultation questions

Section A: The Vision, Priorities and Outcomes Framework

Vision

We will have a sustainable, inclusive and accessible transport system, helping deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors.

Four priorities shown in bold, each with three outcomes

Promotes equality

Will provide fair access to services we need
Will be easy to use for all
Will be affordable for all

Takes climate action

Will adapt to the effects of climate change
Will help deliver our net-zero target
Will promote greener, cleaner choices

Helps our economy prosper

Will get us where we need to get to
Will be reliable, efficient and high quality
Will use beneficial innovation

Improves our health and wellbeing

Will be safe and secure for all
Will enable us to make healthy travel choices
Will help make our communities great places to live

Q1: Is the Vision that is set out for the National Transport Strategy the right Vision for transport policy over the next 20 years?

Yes x No ☐

Please explain your answer

However we would note that, the Vision suggests that the strategy is for;

- 'all of Scotland' but the document is heavily focused on towns and cities
- the whole system (people and freight), but the document is VERY light on freight.

Q2a: 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?

Yes x No ☐

Please explain your answer

The 'Helps our Economy Prosper' Priority should have a specific outcome related to freight. Indeed it may be that the Strategy needs a separate document to address freight.

Q2b: Are some of these Priorities and Outcomes more important than others or are they equally important?

Please explain your answer

Given that the Scottish Government has stated that there is a climate emergency and that the net zero emissions target and milestones have been brought forward this would suggest that Takes Climate Action is a paramount imperative on which we have to deliver while meeting the other priorities. This imperative creates substantial challenges. Investment and clear direction will be required if we are to make opportunity from this challenge.

Q3: Are the Challenges the Strategy highlights in Chapter 3, the key Challenges for transport, or are there others the Strategy should focus on?

Timber Transport Forum is primarily interested in the issues of rurality and freight.

The Forum provided a detailed [response](#) to the 2017 call for evidence and has fed into the National Transport Strategy development workshops attending and contributing evidence to a dozen workshops. Much understanding of rural freight was shared and discussed in these sessions. Most of this understanding appears to have been lost from the narrative of the consultation document.

Rural

The section on rural and remote makes barely any reference to freight, (a brief mention in respect of islands).

The section on rural falls into the familiar trap of focusing on the delivery of services to rural communities. If we are to deliver for 'all of Scotland' there needs to be a clear recognition that rural Scotland is an important productive part of the nation's economy.

This point, and the importance of transport in addressing it, was clearly made in the National Council for Rural Advisor's report [New blueprint for Scotland's rural economy: recommendations to Scottish Ministers](#).

The distances involved in travelling and moving (people and freight) across Scotland are not large yet the quality of infrastructure is such that journey time, reliability and resilience are very poor.

The strategy must clearly recognise the importance of modern, efficient and robust hard transport infrastructure (roads, rail and shipping infrastructure) throughout rural Scotland to serve our productive land uses and the wider rural economy. The Strategic Transport Projects Review requires clear direction in this regard.

The condition of both the rural trunk network and the 30,000km of local minor roads that serve rural Scotland create real limitations for the rural economy and this needs recognised and addressed at a national level. The Forum recently [responded](#) to the Scottish Parliament's REC Committee's call for evidence in this regard and we would refer you to this response.

Freight

The analysis of freight issues is concise! However it provides no obvious direction for how the recognised challenges will be addressed.

The analysis recognises that the vast majority of freight is carried by road and remains within Scotland and that the majority of freight is moved in HGVs over 3.5 tonnes (well over 3.5 tonnes!). It then mentions one specific challenge relating to safe lorry parks. While this is a valid issue, it is far down the list of major challenges and relatively easily addressed compared to the wider issues.

The big strategic challenge is how we modernise our freight transport infrastructure moving (currently) 271 million tonnes of freight/yr in such a way that we meet the imperative of decarbonisation while growing our economy.

The challenge has been set out in detail in the 2019 (UK) National Infrastructure Commission's [Better delivery: The Challenge for Freight](#); Freight Study final report which calls for a Clean Freight Revolution. While this report provides no focus on Scotland or rural it does cover freight well and the National Transport Strategy should reflect the recommendations in a Scottish context. The report does propose the establishment of a Freight Leadership Council. While presumably Scottish interests will contribute to this it may also be appropriate to establish a suitably resourced Scottish Freight Leadership Council to replace the somewhat ineffective an unresourced ScotFLAG.

The National Transport Strategy needs to address the decarbonisation of freight head on and provide a clear direction for the freight sector. At the same time it needs to demonstrate how we achieve decarbonisation targets without contracting our efficient freight services to the central belt and cities and leaving rural Scotland in a dirty decline. As the Strategy's first priority states, 'everyone in Scotland will share in the benefits of modern and accessible transport system'. For the forestry and timber sector to contribute its full potential to addressing the climate emergency, improving the efficiency and reach of rural freight infrastructure is critical.

The Timber Transport Forum provided a [detailed response](#) to the 2019 Infrastructure Commission for Scotland's Call for Evidence and again we would refer you to this response. We await the ICS report but presume the NTS will incorporate appropriate recommendations.

Section B: The policies to deliver the NTS

Through the process to develop the National Transport Strategy, 14 policies have been identified that will deliver its Priorities and Outcomes and address the Challenges. These are listed below:

[The Forum responses to Qu 4a are given below](#)

- plan our transport system to cope with the effects of climate change
- continue to improve the reliability, safety and resilience of our transport system
[There should be a specific policy to achieve 50mph HGV traffic across the whole of the trunk road network as per England and Wales.](#)

[The strategy needs to address how the country deals with the 30,000km of minor rural road which is in increasingly poor condition and is ill-adapted to modern traffic.](#)

- embed the implications for transport in spatial planning and land-use decision making

The Timber Transport Forum promoted this policy but the key issue has been lost from the narrative. While development that is delivered through the planning framework will generally take account of transport requirements, the bulk of our rural land under farming and forestry is developed outwith the scope of local authority planning and below the radar (and the understanding) of the National Planning Framework. As a result we have developed a forest resource that is not served by adequate freight infrastructure. The strategy should address this specifically.

It is not clear what the 'Place Principle' is and what its implications are.

- integrate policies and infrastructure investment across the transport, energy and digital system
- provide a transport system which enables businesses to be competitive domestically, within the UK and internationally

This requires more specific recognition of the domestic transport needs of rural businesses where the constraints of the transport network are most apparent. The forest and timber industry will be generating a sustainable harvest of 9-10 million tonnes of timber each year within the next decade and needs to share the limited capacity road space and other transport infrastructure with rural communities and with the other growing rural freight intensive industries – whisky, aquaculture, farming and food, minerals, renewables, construction, wholesale and retail; all alongside a substantial recent increase in road-based tourism on some of our least developed infrastructure. A clear integrated strategic approach to this rural infrastructure capacity deficit is required.

- provide a high-quality transport system that integrates Scotland and recognises our different geographic needs
This policy requires clarification. Scotland doesn't have different 'geographic needs' it has a varied geography that requires appropriate transport policies. Transport policy is critical in ensuring all of Scotland feels connected and can benefit from and contribute to the prosperity of our country. At present there is a huge infrastructure imbalance which results in those furthest from the central belt and with the longest journeys to make to connect to markets and cities having the poorest transport infrastructure and the most costly and time consuming/km journeys.
- improve the quality and availability of information to enable better transport choices
- embrace transport innovation that positively impacts on our society, environment and economy
The strategy does need to provide a clearer direction of travel to meet decarbonisation targets and develop automation opportunities.
There are some 'innovations' where Scotland has been in reverse for many decades. We move far less freight by rail than we did in the past as we have failed to invest in rail freight infrastructure and the fragmentation of the rail

sector makes developing a service very challenging. The strategy should reflect the government's targets to increase rail freight and provide policy enablers to achieve this.

- improve and enable the efficient movement of people and goods on our transport system
Freight should be separated out here as it is not being adequately addressed in the strategy document and the policy enablers are distinct from those for moving people.
- provide a transport system that is equally accessible for all
- improve access to healthcare, employment, education and training opportunities to generate inclusive sustainable economic growth
- support the transport industry in meeting current and future employment and skills needs
- provide a transport system which promotes and facilitates travel choices which help to improve people's health and wellbeing
- reduce the transport sector's emissions to support our national objectives on air quality and climate change
The NTS2 looks forward 20 years to 2040. Given the Scottish Government's recognition of the Climate Emergency the policy on climate change needs to be much more direct and explicit.
suggest
 - Ensure transport meets the net zero milestones and targets signed up to by the Scottish Government.

Q4a: Are these the right policies to deliver the Priorities and Outcomes of the National Transport Strategy? Please explain your answer

See above

Q4b: Are some of these policies more important than others or are they equally important?

Please provide details.

Climate change targets should be paramount.

Part of the Scottish Government response to Climate Emergency is to reinforce and extend planting targets to expand forest cover to meet this imperative. Much of the forest cover we have now arose from a previous imperative to meet post war strategic timber reserves and, while the forests were created, - and have now become both an effective carbon sink and the feedstock for a modern low-carbon high-tech rural industry - the freight infrastructure serving the resource remains a weak point in the supply chain. It would be sensible this time to develop appropriate infrastructure alongside the expanding forest cover.

The second priority should be to provide a high-quality transport system that integrates Scotland (with the qualification noted above).

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

Q5a: 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.

It is lamentable that after several years of calls for evidence and the establishment of a role and responsibility working group, the outcome appears to be 'further collaborative work to look at implementable models'.....

While a regional approach to governance may be appropriate, the Timber Transport Forum deals with several large rural roads authorities where the local knowledge of council staff has been critical in enabling timber transport on the minor rural road network.

The Scottish Government must provide context to the Strategic Transport Projects Review to ensure that the benefits of investment in transport investment serve the country as a whole rather than focus on the marginal improvement of intercity transport services.

The condition of both the rural trunk network and the 30,000km of local minor roads that serve rural Scotland create real limitations for the rural economy and substantial investment will be required to modernise them. The scale of the challenge requires a national response.

The Forum recently [responded](#) to the Scottish Parliament's REC Committee's call for evidence on road maintenance and we would refer you to this response.

Q5b: 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

Where this focuses on the movement of people, this should most certainly involve the local communities. With regard to heavy freight, there is very little recognition or understanding of freight transport by society in general – what the UK Infrastructure Commission referred to as freight blindness. However there is also little understanding of both freight and rural issues by metropolitan transport planners. The centralisation of Transport Scotland in Glasgow (and to some extent Edinburgh) is reflected in the limitations of current national policy. Imagine for a moment, that the HQ of Transport Scotland was in Wick or Stranraer, or Fort William - how might transport policy differ?. The Strategy should aim to ensure that there is appropriate engagement in transport policy at all levels and critically from sectors beyond transport itself.

The Timber Transport Forum is involved in addressing community concerns about the impact of HGVs on rural roads. Most of these concerns stem from the poor condition of local minor roads and the lack of modernisation to suit them to the freight needs of 21st century land uses.

The forest industry is the only sector we are aware of that deliberately consults and engages with local authorities and communities over use of the road network. Our guidance on this can be found [here](#).

Section D: The Strategy as a whole

Q6: Does the National Transport Strategy address the needs of transport users across Scotland, including citizens and businesses located in different parts of the country?

Yes ☐ No ☒

Please explain your answer

The challenge posed by climate emergency is not adequately addressed.

The needs of timber transport and other rural road freight and the scope for intermodal domestic freight transport are not adequately addressed.

The transport infrastructure deficit in rural Scotland is not adequately recognised or addressed.

Section E: Looking ahead

Q7a: What aspects of the transport system work well at the moment?

Please provide details

..... The contactless card payment on buses is transformational!

Q7b: What practical actions would you like to see the National Transport Strategy take to encourage and promote these?

Please provide details

The large majority of Scotland's trunk road network is rural and remains stuck with a 40mph speed limit for HGVs (apart from the minimal motorway network and a short stretch of the A9). This in turn makes the cost of transport and providing transport services much higher. At a minimum, the Strategy must commit to delivering a 50 mph HGV trunk road network throughout Scotland – as is the case in England and Wales.

A strategic approach is required for the deliberate modernisation of a targeted proportion of the 50% of our road network length that is minor rural roads. This should be part of a wider investment led approach to rural development.

Q8a: What aspects of the transport system do not work well at the moment?

Please provide details

The rural road network is underfunded and 'tired'.

The freight capacity of much of our rural road network is not suited to the 21st Century nor to the future challenge of providing decarbonised freight services.

The freight grant system is dysfunctional providing almost no uptake to the opportunities offered by coastal shipping and bulk rail haulage.

Rail freight infrastructure beyond the central belt is impoverished and very limited and this makes market led rail freight interventions largely unachievable.

Q8b: What practical actions would you like to see the National Transport Strategy take to improve these?

Please provide details

A more deliberate intervention and investment led approach to modernising rural freight is required. A Clean Freight Revolution – as per the UK Infrastructure Commission.

A Freight Leadership Council should be established at the Scottish level.

Q9: 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.

When the ScotFLAG rural sub group set out to understand the capacity issues relating to rural freight the available data was found to be very poor and there were no resources to develop and map what data there was. This should be addressed.

Q10: Is there anything else you would like to say about the National Transport Strategy?

Please provide details

The headline indicator 9. for freight should involve measures of freight journey time across Scotland.

Indicator 5 is not an appropriate measure of the outcome

Section F: Strategic Environmental Assessment (SEA)

Q11: What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in Section 5 of the SEA Environmental Report? (Please give details of additional relevant sources)

Q12: What are your views on the predicted environmental effects as set out in chapter 6.3 of the SEA Environmental Report?

Q13: What are your views on the proposals for mitigation and monitoring of the environmental effects set out in chapter 6.5 and 7 of the SEA Environmental Report?

Q14: Is there anything else you would like to say about the SEA Environmental Report?

Thank you for your time and your contribution.

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