



FTA response to the discussion draft

Freight Transport Association

The Freight Transport Association (FTA) represents the transport needs of UK industry. Its membership is comprised of manufacturers, retailers, logistic companies, hauliers and organisations in the public and private sectors. The Association's interests are multi-modal and in addition to consigning 90 per cent of freight carried on rail and over 70 per cent of sea and air freight its members operate in excess of 200,000 goods vehicles, approximately half the UK fleet of commercial vehicles.

Overview

FTA welcomes the opportunity to respond to the National Planning Framework 2 discussion document. Although not directly involved in planning matters has an interest in the future direction that special development in Scotland is likely to take. The statutory basis of the framework will hopefully mean shorter lead times for the developments included in it. FTA will restrict comments to the infrastructure developments identified as of National importance and of concern to the logistics industry and others that it feels should be incorporated in the framework.

It is pleasing to note the number of developments that concern the transport industry and freight transport in particular. For many years the importance of the transport infrastructure to a healthy economy has been overlooked or misunderstood. However there is very little in the document relating to the main mode of goods movement in Scotland – road. It is, perhaps, regrettable that the National Freight Action Plan work on multi-modal freight hubs together with the Strategic Transport Projects Review and Regional Transport Strategies are all being done at the same time as the NPF. It is essential that the results of these other projects are taken account of in the planning framework. The current programme of infrastructure improvement up to 2012 should finally see the central Scotland motorway network brought up to a reasonable standard and other routes improved. However it does seem strange to trumpet the upgrading of the six mile long 'Cumberland gap' between the M74 and the M6 as helping reduce journey times on the Euro-route to Ireland when there is almost a hundred miles of A75 between Gretna and the Loch Ryan ferry ports that is mainly single carriageway and in severe need of improvement.

However there are other parts of Scotland that still suffer from poor infrastructure and it is to be hoped that the Strategic Transport Projects Review will address these for improvement after 2012. The current vogue for using the expression 'corridor' is accepted but we must bear in mind that, for the foreseeable future most freight will continue to move by road and hopefully Transport Scotland will be looking seriously at such important Trade Routes as the A75, A77, A7, A82, A9, A95 and A96 to name but a few.

The Planning Framework Proposals

FTA is pleased that the importance to the economy of good infrastructure has been recognised in the document but does question the restriction to a total of nine and the relative short term horizon of these projects.

- **Replacement Forth Crossing.**

It is vital that work commences on this structure as soon as possible. The problems of corrosion on current Forth Road Bridge are well documented and, if the dehumidification work is not successful the bridge could be closed to goods vehicles as soon as 2013 well before the replacement is due to be finished. The adverse effects on the economy of Fife and Scotland can only be imagined.

- **Grangemouth Freight Hub**

Grangemouth is Scotland's largest container handling port handling feeder services to the continent and the introduction of rail interchanges have led to increasing volumes. However much of the container traffic at Grangemouth arrives and departs by road and will continue to do so. The immediate road links, whilst not perfect are reasonably good but the A801 link from M9J4 to M8J4 is a disgrace and has been for decades. It will not be cheap but a real solution for the Avon Gorge problem must be provided. Currently Grangemouth suffers from not being a 24 hour operation.

- **Rosyth International Container Terminal**

It is likely that, if growth continues or accelerates that Grangemouth will reach saturation in the not too distant future. The proposal for a container terminal at Rosyth would have the advantage of ships not having to lock in and out as they have to do at Grangemouth. Rosyth is also reasonably close to the Motorway system and could be directly served by rail with little difficulty. However, as noted above, the Kincardine Bridge carries a heavy freight load and, if Rosyth was to be developed, attention would have to be given to the A985.

- **Scapa Flow Transshipment Facility**

The need identified for a deep water transshipment facility at Scapa Flow is unlikely to have a direct effect on the movement of freight in Scotland. As FTA understands the proposal the facility would handle international movements such as between Europe and the rest of the world. It is likely that any freight leaving or arriving in Scotland would still be carried in feeder vessels from Grangemouth, Greenock or Rosyth.

- **Other proposals**

Although not directly concerning the logistics industry the other proposals would, by their very nature, involve the logistics industry as does everything else that we do. These large civil engineering projects will demand careful planning of other aspects of the Scottish economy are not to be affected by them.

Further Comments

As noted above FTA questions the limitation, firstly to nine projects and secondly to the nine chosen. No doubt other responses will suggest projects that have been omitted but FTA does have two suggestions that it feels are of national importance and should be considered for inclusion. The question of servicing Northern Ireland from the West coast of Scotland has not been addressed. The infrastructure in terms of roads leading to the Loch Ryan ports in particular is not suitable for the loads that the size of ferries being used carry. Neither is rail provision suitable. This acts as a throttle on development on both sides of the North Channel.

The omission of Hunterston as a potential deep water container port is also strange. It is understood that the current owners have no immediate plans to develop the port but, given the potential that Hunterston offers, it seems strange that it has been omitted from a long term strategy.

Conclusion

The Draft National Planning Framework sets out what have been identified as the major transport, environmental and energy infrastructure projects essential for Scotland's long term development. The projects selected, however are, in the main, fairly short term and do not stretch imagination or vision to the 2030 horizon. There are also many projects that may be considered, if not of National importance, at least of multiregional importance and which would tick as many of the criteria boxes as some of those already selected. Perhaps, in order that such projects are not entirely disregarded in political circles there should be a 'first division' of projects sitting below the première list. There should also be a long term futuristic vision that may need technologies that have not been fully developed yet. Fixed links to the Western Isles and Orkney are examples.

Gavin Scott 26 March 2008